

10010 E. 16TH STREET TULSA, OK 74128-4813

March 8, 2001

61 Forsyth S.W. Atlanta, Georgia 30303 Region IV U. S. Environmental Protection Agency Groundwater Protection Branch Mr. William R. Mann

RE: Permit Renewal Application for IMCO Recycling Industrial Injection Well, Morgantown, Kentucky
Permit No. KYI0429

Dear Mr. Mann:

Enclosed is a copy of the Permit Renewal Application for IMCO's Injection Well.

to you separately. 2001, in your presence. The MIT passed. The Pumping Test data will be evaluated and sent The Mechanical Integrity Test (MIT) and Pumping Tests were conducted on February 26-27,

If you have any questions or need additional information, please call me at (918) 665-6575.

Sincerely yours,

Chief Geologist Irfan Taner

PERMIT RENEWAL APPLICATION
FOR
CLASS I NON-HAZARDOUS
INDUSTRIAL INJECTION WELL
(UIC Permit No. KY10429)

IMCO Recycling Inc.
Morgantown Plant
Morgantown, Kentucky

January 2001

Prepared by

A & M Engineering and Environmental Services, Inc.

10010 East 16th Street

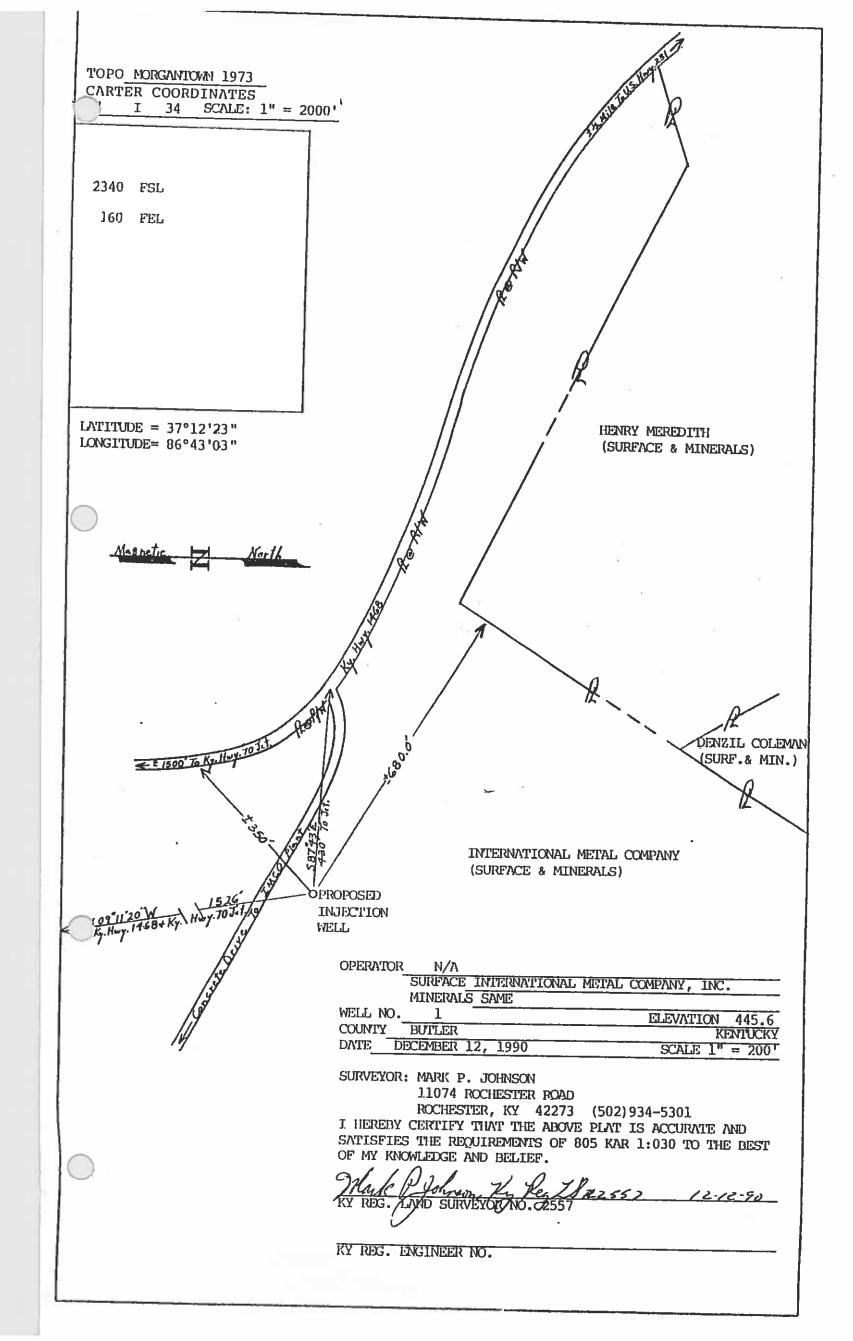
Tulsa, Oklahoma 74128

918-665-6575

Form Approved. OKB No. 2040-0042 Approval expires 9-30-91

4. Surface Location Description of Injection Well's)
State 3. Facility Name 1. Permittee 2. Operator , 0, Feet from (E/M) Feet from (M/S) Township NAME AND OFFICIAL TITLE (Please type or print) Address (Permanent Mailing Address) (Street, City, State, and ZIP Code) Address (Street, City, State, and ZIP Code) Address (Street City, State, and ZIP Code) 609 Gardner tane Road (Hwy 1468) Morgantown, KY 42261 Submit with this Completion Form the attachments listed in Attachments for Completion Form. 609 Gardner Lane Road (Hwy 1468) Morgantown, KY 42261 5215 N. O'Connor Blvd., Ste 1500 Irving, TX 75039 IMCO Morgantown Plant 160 feet from E line 2340 feet from S line C. Lee Newton, Senior V.P. EPA Kentucky submitted in this document and all attachments and that based on my inquiry of those individuals the possibility of fine and imprisonment. (Ref. 40 CFR 144.32). and complete. I am aware that there are significant penalties for submitting false information, including immediately responsible for obtaining the information, I believe that the information is true, accurate. I certify under the penalty of law that I have personally examined and am familiar with the information IMCO Recycling Inc. IMCO Recycling Inc. **COMPLETION FORM FOR INJECTION WELLS** UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20480 2 ADMINISTRATIVE INFORMATION SIGNATURI CERTIFICATION County Range Line of quarter section and Line of quarter section Butler ω 4 % section Telephone Number (502) 526-5688 14 DATE SIGNED 3/13/07 CONTINUED ON REVERSE

EPA Form 7620-9 (2-84)



SUMMARY

IMCO Recycling Inc. was granted a permit on October 9, 1990 to construct a Class I non-hazardous industrial liquid disposal well at its plant near Morgantown, Butler County, Kentucky.

The Class I injection well was constructed during the period August 1991-October 1992. During the construction, due to technical difficulties, IMCO applied for two permit modifications which were granted. The construction of the well was completed at the end of September 1992 and the Mechanical Integrity Test on the IMCO injection well was performed on October 9, 1992 in the presence of a U.S. EPA Region IV representative. The construction and operation chronology of the IMCO injection well is presented in Exhibit 1.

The IMCO injection well was drilled to 6,450 feet depth and completed as an openhole in the Knox Dolomite from 4,703 to 6,450 feet. The lowermost USDW (Underground Source of Drinking Water) is encountered at a depth of 210-260 feet in Pennsylvanian sandstone. The surface casing is set and cemented at a depth of 471 feet to protect USDW sources. The long string casing is set and cemented at a depth of 4,703 feet. The injection is through tubing and injection packer.

The injection well has been operating without any problems since October 1992. During this operation period, only the injection pump and some of the recorders have been exchanged with new ones. A total of 49,881,867 gallons of fluid has been injected as of December 2000. Quarterly reports were provided to U.S. EPA Region IV.

A Mechanical Integrity Test (MIT) was conducted on October 28, 1997 in the presence of a U.S. EPA Region IV representative and the external and internal integrity of the IMCO well were confirmed.

The enclosed document is prepared in accordance with permit conditions and presents all information and construction procedures for the injection well. A copy of the permit with the modifications is enclosed after the list of attachments, appendices and figures.

EXHIBIT 1

IMCO RECYCLING INC. MORGANTOWN, KENTUCKY INJECTION WELL

Construction Chronology

Angust 0. 10. 1001	Move Drilling Big and set up
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August 11-12, 1991	Drilled 17 1/2" hole to 42 feet and set up 13 3/8" conductor pipe with 100 sacks of Class "A" cement.
August 12-13, 1991	Drilled 12 1/4" hole to 471. Run SP-Induction Electric Log. Set 475 feet 9 5/8" K-55 casing (36 lb/ft) with 300 sacks of Class "A" cement including 4% calcium chloride.
August 13-16, 1991	Drilled 8 3/4" hole to 2,526 feet depth.
August 17-21, 1991	Drilled 7 7/8" hole to 4,000 feet depth.
August 22, 1991	Run Cement Bond Log, Dual Induction, Gamma Ray, Compensated Density and Neutron, and Digital Sonic Logs. Set 7" K-55 casing (23 lb/ft) at 2,542 feet with 450 sacks of Class "A" cement.
August 23-25, 1991	Move drilling rig out.
August 26, 1991	Move workover rig on location.
August 27-29, 1991	Drill cement and packer shoe out.
August 30-31, 1991	Cleaned the well with 2% KCl water. Run Cement Bond and Evaluation Logs and Formation Tester.
September 3-4, 1991	Test the well and acidize with 3,000 gallons of 15% HCl. Test again, low injectivity potential.
September 5 - October 15, 1991	Evaluated different options for completing the well and decision was made to drill deeper into the Knox Dolomite. New permits were obtained from U.S. EPA and Kentucky Oil and Gas Division.

December 9, 1991	December 7, 1991	December 5-6, 1991	December 4, 1991	December 3, 1991	November 27- December 2, 1991	November 26, 1991	November 24-25, 1991	November 22-23, 1991	November 16-21, 1991	November 16-17, 1991	November 15, 1991	November 8-14, 1991	November 6-7, 1991	November 4-5, 1991	October 19- November 4, 1991	October 16-18, 1991
Tried to fish the cones out. No success. Put flat bottom mil and trip in the hole.	Tripped out and the cones on bit were gone.	Drilled down to 4,702 feet. Having problem drilling the packer shoe. Having trouble with hydraulic system.	Mechanical problems.	Start drilling cement and packer shoe with 3 7/8" bit.	Wait on cement to set and harden.	Run 4 1/2" K-55 casing liner (10.5 lb/ft) from 2,300 to 4,703 feet. Used Baker Hyflo "III" liner hanger. Cemented the casing with 650 sacks of Class "A" cement.	Clean well out.	Move workover rig on location and rig up.	Got approval for completion procedures from U.S. EPA and Kentucky Oil and Gas Division.	Moved out the drilling rig.	Run DST #4.	Drill 6 1/8" hole from 5,872 to 6,450 feet. Run SP-Dual Induction, Gamma Ray and Density-Neutron Logs.	Run DST #2 and #3 and re-run DST #1.	Run SP-Dual Induction, Gamma Ray and Density-Neutron Logs. Run DST #1.	Drilled 6 1/8" hole to 5,872 feet depth.	Move drilling rig on location and rig up.

December 30-31, 1991 December 10-11, 1991 January 7, 1992 January 5-6, 1992 January 4, 1992 December 28-29, 1991 December 19-27, 1991 December 14-18, 1991 December 13, 1991 December 12, 1991 January 2, 1992 January 3, 1992 porous zones with 100-gram shots. Perforated zones: 6432-38', 6420', 6402-4, 6358-74, 6315-30, 6230-52, 6182-88, 6128--38, Swabbed the well for 8 hours. Pulled out tubing bit, hit first bridge at 5,307.45' and second one at 5,987.35'. Cleaned the hole and tripped out. 5024, 4894-4904, 4834-60. 5800 feet depth. Then perforated these zones: 5148-72, 4996-6074-84, 6026-34, 5988-94, 5910-16, 5842-66, 5806-10. Run Differential Temperature Log from 6,457 to 2,300 feet. Run Swab the well and pull out tubing. 1,000 psi wellhead pressure. Run injection test. The result was 10-14 gallons per minute with Cleaned the well and the mud out. Swabbed the well. Repair the swivel and gear box of the rig. discovered the cement leaked below the packer shoe. Run magnet again and recovered two cones and three shanks and metal cuttings. Run impression cone and it came out clean. Trip Trip in with bit to clean the hole. through. Thus could not perforate the zones in between 5300-Gamma Ray Log from 6,457 to 4,700 feet. Start perforating the Cement Bond Log for 4 1/2" casing from 4,705 to 2,300 feet and extra cleaning at total depth. Drilled the bridges and cleaned the well, circulate for 7 hours for Run Temperature Log and hit bridge at 5,980 feet. Trip in with Drilled the packer shoe and some very hard cement and Milled at the bottom (4,702') and trip out, the mill was worn out. The hole bridged at 5305 feet again, the tool could not go Drilled cement to 5,115 feet. in with a new bit.

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October 28, 1997	October 10, 1992	October 9, 1992	February 18- October 1, 1992	February 4-5, 1992	January 20, 1992	January 17, 1992	January 16, 1992	January 15, 1992	January 11, 1992		January 8-10, 1992
Conduct Mechanical Integrity Test in the presence of U.S. EPA Region IV representative (Mr. David Hayes). The test was successful.	Officially started operation and injecting.	Conduct Mechanical Integrity Test in the presence of a U.S. EPA Region IV Representative. The test was successful.	Installation of surface facilities and pump system.	Run tubing in with retrievable packer, set packer, pump annulus fluid with corrosion inhibitor and test the annulus with 1000 psi pressure, packer hold.	Trip in with bit and clean the hole at total depth and pull out.	Trip in with packer and set it. Run injection test and Tracer Log.	Trip in with bit and clean hole out. Trip out.	Trip in with packer and set it. Well treated with 15,000 gallons of HCl acid (28%) in five stages.	Trip in with packer and set it. Swab the well. Connect acid line and tried to acidize, but some pipes were leaking. Pulled out and tested pipes for leaks.	Trip in with the bit. Clean the hole to total depth and circulate four hours for extra cleaning. Pull out to 5150 feet depth and circulate hole for two more hours.	Run Caliper Log in the open hole. Perforated the following zones:: 5732-38, 5712-24, 5680-90, 5658-70, 5612-32, 5570-88, 5534-52, 5464-72, 5398-5406, 5366-70.

LIST OF ATTACHMENTS, APPENDICES AND EXHIBITS

- A Area of ReviewB Maps of Wells/Area and Area of ReviewC Corrective Action Plan and Well Data

- D Maps and Cross-Sections of USDW's

 E Not Applicable

 F Maps and Cross-Sections of Geologic Structure of Area
- G Not Applicable
- H Operating Data
 I Formation Testing Program
 J Stimulation Program
 K Injection Procedures
 L Construction Procedures
- M Construction DetailsN Not ApplicableO Plans for Well Failures

- P Monitoring Program
 Q Plugging and Abandonment Plan
 R Necessary Resources (Financial)
 S Not Applicable
 T Existing EPA and State Permits
 U Description of Business

APPENDICES

- Appendix A Copies of Well Reports (Previously submitted and thus not included)
 Appendix B Chemical Analysis Report of Solid Waste and Leachate
 Appendix C Copy of Property Deed
 Appendix D Electric Logs (Previously submitted and thus not included)
 Appendix E Drill Stem Tests (DST) results, formation fluid analytical reports(Previously submitted and thus not included)
- Appendix F Acid Job and Injection Test Data (Previously submitted and thus not included)
- Appendix G Drilling Records (Previously submitted and thus not included)

EXHIBITS

- Exhibit 1 Construction Chronology

 Exhibit H-1 Annulus Fluid Corrosion Inhibitor Data

 Exhibit L-1 Surface (9 5/8") and Long String (7") Casing Purchase Tickets

 Exhibit L-2 Liner Casing (4 1/2") Tally and Purchase Tickets

- Exhibit L-3 Liner Hanger and Hanger Job Data

 Exhibit L-4 Tubing (3 1/2" and 2 7/8") Tally and Purchase Tickets
- Exhibit L-5 -
- Exhibit L-6 -Injection Packer Data Casing Cementing Job Data and U.S. EPA Inspector's Reports (Conductor Pipe,
- Surface Casing, Long String and Liner)
 Exhibit L-7 Annulus and Packer Pressure Test Data

LIST OF FIGURES

Fig. M-3 Fig. M-4 Fig. U-1	Fig. M-1	Fig. K-1	Fig. H-1	Fig. F-7	Fig. F-6	Fig. F-5	Fig. F-4	Fig. F-3	Fig. F-2	Fig. F-1	Fig. D-2	Fig. D-1	Fig. B-2	Fig. B-1
Filter System Injection and Monitoring System Flow chart of plant operations, IMCO Recycling Inc., Morgantown, Kentucky	Wellhead construction Suction System	Schematic surface design drawing of the IMCO injection well	Annulus Monitoring System	W-E cross-section of IMCO well	N-S cross-section of IMCO well	N-S cross-section of Butler County, Kentucky	Structure and isopach map of New Albany Shale	Structure contour map on base of Beech Creek Formation	Stratigraphic column	Generalized structure map of Kentucky	Map of flood prone areas in the vicinity of IMCO site	Fresh saline water interface contour map of Butler County, Kentucky	Detailed topographic map of IMCO Morgantown plant	Map of area of review and surroundings



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET, N.E.

ATLANTA, GEORGIA 30365

CERTIFIED MAIL RETURN RECEIPT REQUESTED

REF: 4WM-GP

Mr. Thomas Rogers IMCO Recycling, Inc. P. O. Box 1070 Sapulpa, Oklahoma 74067

STED

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Re: Modification of UIC Permit No. KYI0429
Permit Effective: October 9, 1990
Modification Effective: FEB 0 4 1992

Dear Mr. Rogers:

In accordance with 40 C.F.R. §144.41 and as per your request of January 23, 1992, the subject permit is hereby modified to reflect changes in the maximum injection pressure. Enclosed is the revised Underground Injection Control (UIC) permit page with the changes as indicated in your letter. Attach the modification to your permit. Please be informed that under the provisions of 40 C.F.R. §144.41, this is considered a minor modification and is therefore not subject the draft permit, comment period and public notice requirements as contained in 40 C.F.R. Part 124. If you have any questions, please contact William Mann of my staff at (404) 347-3379.

Sincerely yours,

W. Ray Cunningham, Director

Water Management Division

Enclosure

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U. S. ENVIRONMENTAL PROTECTION AGENCY UNDERGROUND INJECTION CONTROL PERMIT AUTHORIZATION TO OPERATE A CLASS I INJECTION WELL EPA UIC PERMIT NUMBER KYI0429

Pursuant to the Underground Injection Control regulations of the U. S. Environmental Protection Agency codified at Title 40 of the Code of Federal Regulations, Parts 124, 144, 146 and 147, UIC Permit Number KYI0429 issued to

IMCO Recycling, Inc. P. O. Box 1070 Sapulpa, Oklahoma 74067

is hereby modified for the following Class I disposal injection well:

IMCO Injection Well #1

IMCO Morgantown Plant

Butler County, Kentucky

Carter Coordinate 14-I-34 2340' FSL x 160' FEL

This modification is in accordance with the limitations, monitoring requirements and other conditions set forth herein. This permit modification consists of this cover sheet and Part I, Page 3.

All references to Title 40 of the Code of Federal Regulations are to regulations that are in effect on the date that this permit modification becomes effective.

This permit modification shall become effective on FEB 0 4 1992

This permit modification shall be attached to the original permit and is hereby made a part thereof. This permit modification shall remain in full force and effect during the operating life of the well, unless the permit is otherwise modified, revoked and reissued, terminated, or a minor modification is made as provided at 40 C.F.R. §§144.39, 144.40 and 144.41.

Date

W. Ray Cunningham, Director
Water Management Division
U. S. Environmental Protection Agency
Region IV

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- (ii) The permittee has not received, within thirteen (13) days of the date of the Director's receipt of the notice required above, notice from the Director of his or her intent to inspect or otherwise review the new injection well, in which case prior inspection or review is waived and the permittee may commence injection.
- (b) The permittee has demonstrated to EPA that the injection well has mechanical integrity, and has submitted the reports as specified in Part I, Section A, item 3.

SECTION B. OPERATING REQUIREMENTS

1. Injection Operation

Beginning on the date that Part I, Section A, item 4, is completed and lasting through the term of this permit, the permittee is authorized to inject only saltwater leachate from the solid waste landfill collected in a retention pond located on the plant site and runoff water from the IMCO plant facilities in Morgantown, Kentucky.

- (a) Injection shall be limited to the undifferentiated formations of Devonian-Silurian-Ordovician-Cambrian Systems in the interval between 4705 feet and 6450 feet below land surface.
- (b) Injection Pressure Limitation
- (i) Maximum injection pressure, measured at the wellhead, shall not exceed 2700 psig unless IMCO performs an EPA approved step-rate injection test.
- (ii) Injection at a pressure which initiates or propagates fractures in the confining zone or causes the movement of injection or formation fluids into an underground source of drinking water is prohibited.
- iii) Injection between the outermost casing protecting underground sources of drinking water and the well bore is prohibited.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RTLAND STRE

345 COURTLAND STREET, N.E. ATLANTA, GEORGIA 30365

DEC 6 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REF: 4WM-GP

Mr. Thomas W. Rogers
Senior Vice-President
IMCO Recycling, Inc.
P. O. Box 1070
Sapulpa, Oklahoma 74067



Re: Final Modification of UTC Permit No.: KYI
Permit Effective: October 9, 1990
Modification Effective: NOV 2 9 1991
Permit Writer: William Mann

Dear Mr. Rogers:

Enclosed is the modification of the Underground Injection Control (UIC) permit referenced above. This action constitutes the U. S. Environmental Protection Agency's final permit decision in accordance with 40 C.F.R. \$124.15(a). Please replace your existing UIC permit page(s) with the corresponding modified page(s). Under 40 C.F.R. \$124.19, any person who filed comments on the draft modification or participated in the public hearing may contest this decision by petitioning the Administrator to review any condition of the modification. In this case, since no public hearing was held and no comments were filed during the public notice period, no appeal may be taken regarding this decision. Pursuant to 40 C.F.R. \$124.15(b) this permit modification will be effective as specified in the permit modification. Information on legal matters may be obtained by contacting Ms. Melissa Heath, Assistant Regional Counsel, at (404) 347-3777.

Sincerely yours,

W. Ray Cunningham, Director Water Management Division

Enclosure

Printed on Recycled Paper

UNDERGROUND INJECTION CONTROL PERMIT AUTHORIZATION TO OPERATE A CLASS I INJECTION WELL EPA UIC PERMIT NUMBER KY10429 U. S. ENVIRONMENTAL PROTECTION AGENCY

Pursuant to the Underground Injection Control regulations of the U.S. Environmental Protection Agency codified at Title 40 of the Code of Federal Regulations, Parts 124, 144, 146 and 147, UIC Permit Number KYI0429 issued to

IMCO Recycling, Inc.
P. O. Box 1070
Sapulpa, Oklahoma 74067
is hereby modified for the following Class I disposal injection well:

Butler County, Kentucky
Carter Coordinate 14-I-34, 2340' FSL, 160' FEL IMCO Injection Well #1

This modification is in accordance with the limitations, monitoring requirements and other conditions set forth herein. This permit modification consists of this cover sheet; Part I, Pages 1, 2, 3, 4, 5, 6, and 7.

All references to Title 40 of the Code of Federal Regulations are to regulations that are in effect on the date that this permit modification becomes effective.

This permit modification shall become effective on NOV 2 9 1991

This permit modification shall be attached to the original permit and is hereby made a part thereof. This permit modification shall remain in full force and effect during the operating life of the well, unless the permit is otherwise modified, revoked and reissued, terminated, or a minor modification is made as provided at 40 C.F.R. §§144.39, 144.40 and 144.41.

Date

Region IV Water Management Division W. Ray Cunningham, Director U.S. Environmental Protection Agency

PART I

WELL SPECIFIC CONDITIONS

SECTION A. CONSTRUCTION REQUIREMENTS

.. Casing and Cementing

The permittee shall case and cement the well and maintain all casing and cement so as to prevent the movement of fluids into or between underground sources of drinking, water. The casing and cement used in the construction of the well shall be designed for the life expectancy of the well. Construction of this well shall be performed as specified in Attachments L & M of the permit application and any subsequent EPA approved amendments made to Attachments L & M.

2. Tubing and Packer

Injection may only take place through tubing with a packer set within the casing no higher than 50 feet above the base of the deepest casing. The tubing and packer shall be maintained in a manner which is compatible with the injection operation specified in Part I, Section B, and which prevents the movement of fluids into or between underground sources of drinking water.

Logs, Tests and Reports

The following logs, tests and reports shall be prepared and submitted to $\mathtt{EPA:}$

- well is required before injection can be authorized. The demonstration will consist of a pressure test on the tubing/casing annulus to at least 300 psig with less than 3% pressure loss in 30 minutes. The permittee shall contact EPA to arrange a date to conduct this test. A representative of EPA will be present to witness this test.
- (b) A composite copy of a Gamma Ray-Self Potential-Dual Induction-SFL-Caliper Log from TD to surface.

- (c) A composite copy of a Gamma Ray-Caliper-Lithodensity-Compensated Neutron Log from TD to the base of the surface casing.
- (d) A fracture identification log from the base of the deepest casing to 500 ft. above the base of the deepest casing.
- (e) A lithology log from surface to TD based on cuttings taken every ten (10) feet.
- (f) A cement bond log from 450 ft. to surface; a cement bond log from 2485 ft. to 450 ft. and a cement bond log from the base of the liner to 2485 ft.
- (g) Copies of all cement invoices indicating volume of cement pumped, class of cement, cement additives, etc.
- (h) Core analysis on any conventional or sidewall cores.
- (i) Fluid analysis of the injection zone. The analysis shall include pH, total dissolved solids, specific gravity, barium, calcium, total iron, magnesium, sodium, bicarbonate, carbonate, chloride, sulfate, carbon dioxide, dissolved oxygen, and hydrogen sulfide.
- (j) The permittee shall prepare a report, including procedures and results of the logging and testing programs. Each log shall include a written interpretation prepared by a knowledgeable log analyst. The report must be submitted in accordance with Part I, Section A, item 4, and shall be signed in accordance with Part II, Section E, item 11, of this permit.

. Commencing Injection

The well authorized by this permit may not commence injection until:

- (a) Construction is complete, and the permittee has submitted to the Director, by certified mail with return receipt requested, a notice of completion using EPA Form 7520-10, and either:
- (i) The Director has inspected or otherwise reviewed the new injection well and finds it is in compliance with the conditions of the permit; or

- (ii) The permittee has not received, within thirteen (13) days of the date of the Director's receipt of the notice required above, notice from the Director of his or her intent to inspect or otherwise review the new injection well, in which case prior inspection or review is waived and the permittee may commence injection.
- (b) The permittee has demonstrated to EPA that the injection well has mechanical integrity, and has submitted the reports as specified in Part I, Section A, item 3.

SECTION B. OPERATING REQUIREMENTS

Injection Operation

Beginning on the date that Part I, Section A, item 4, is completed and lasting through the term of this permit, the permittee is authorized to inject only saltwater leachate from the solid waste landfill collected in a retention pond located on the plant site and runoff water from the IMCO plant facilities in Morgantown, Kentucky.

a) <u>Injection Zone</u>

Injection shall be limited to the undifferentiated formations of the Devonian-Silurian-Ordovician-Cambrian Systems in the interval between 2485 feet and 8000 feet below land surface.

(b) Injection Pressure Limitation

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- (i) Maximum injection pressure, measured at the wellhead, shall not exceed 815 psig unless IMCO performs an EPA approved step-rate injection test or installs a liner below 2485 feet.
- (ii) Injection at a pressure which initiates or propagates fractures in the confining zone or causes the movement of injection or formation fluids into an underground source of drinking water is prohibited.
- (iii) Injection between the outermost casing protecting underground sources of drinking water and the well bore is prohibited.

2. Annulus Operation

The annulus between the tubing and the long-string casing shall be filled with brine or other fluid as approved by the Director. The annulus pressure shall be maintained at 10 psig.

The annulus shall be monitored with a gauge designed to indicate both a vacuum (below atmospheric) and positive pressure (above atmospheric). The permittee shall comply with Part I, Section B, item 3, when a change in the annulus pressure of 25 psig occurs. The permittee shall provide an explanation to the Director for the change in pressure and measures that will be taken to restore annulus pressure to achieve compliance with this Section. If the cause of annulus pressure change is not corrected within 48 hours, the permittee shall cease injection unless such order to cease operation is waived by the Director.

3. Loss of Mechanical Integrity During Operation

The permittee shall cease injection if a loss of mechanical integrity as defined at 40 C.F.R. §146.8 becomes evident during operation. Operation shall not be resumed until the permittee has complied with the provisions of Part II, Section G, of this permit regarding mechanical integrity demonstration and testing.

The permittee shall notify the Director of the loss of mechanical integrity in accordance with the reporting procedures in Part II, Section E, item 12(d).

SECTION C. MONITORING REQUIREMENTS

1. Sampling and Analysis Methods

Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. Grab samples shall be used for the laboratory analysis of the physical and chemical characteristics as specified in Part I, Section C, item 3(a). Test methods and procedures shall be as specified at 40 C.F.R. §136.3 or 40 C.F.R. Part 261, Appendix III. When the analytical method for a particular parameter is not specified at either 40 C.F.R.

\$136.3 or 40 C.F.R. Part 261, Appendix III, the permittee must obtain the Director's approval of the method used. The permittee shall identify the types of tests and methods used to generate all monitoring data. Reports to be generated from monitoring data are specified in Part I, Section D.

2. Injection Operation Monitoring

The permittee shall monitor the operation of the injection well as follows:

Pressure buildup in the Injection Zone	Cumulative Volume (barrels) of Injected Fluid	Flow Rate (barrels/day) of Injected Fluid	Annulus Pressure (psig) at Wellhead	Injection Pressure (psig) at Wellhead	Parameter
Annually	Continuous	Continuous	Continuous	Continuous	Monitoring Frequency

3. Injection Fluid Analysis

The permittee shall conduct an injection fluid analysis at least once every three (3) months and whenever changes are made to the injection fluid. Analyses shall be made beginning within three (3) months from the effective date of this permit, or three (3) months from the most recent analysis, whichever is later. An analysis must include:

(a) A list of all chemicals and their composition used for any well stimulation and fracturing during that sampling period; and a list of any additives used and their chemical composition, including any inhibitors used to prevent scaling, corrosion, or bacterial growth. These lists should indicate the brand name of the product and the manufacturer.

Permit Effective: October 9, 1990 Modification Effective: NOV 2 9 1991

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- (b) pH, total dissolved solids, specific gravity, barium, calcium, total iron, magnesium, sodium, bicarbonate, carbonate, chloride, sulfate, carbon dioxide, dissolved oxygen, and hydrogen sulfide.
- (c) Other physical and chemical characteristics of the injection fluid as required by the Director.

SECTION D. REPORTING REQUIREMENTS

1. Reports on Well Tests and Workovers

Within thirty (30) days after the completion of the activity, the permittee shall report to the Director the results of the following:

- (a) Mechanical integrity tests, other than those specified in Part I, Section A, item 3; and
- (b) Any well workover, logging or other test data, other than those specified in Part I, Section A, item 3, revealing downhole conditions.

Reporting of Monitoring Results

Monitoring results, as specified in Part I, Section C, shall be reported quarterly on EPA Form 7520-11 and must be postmarked by the 28th day of the month following the first quarter after the effective date of this permit.

Copies of the monitoring results required by Part I and all other reports required by Part II shall be submitted to the Director at the following address:

U. S. Environmental Protection Agency Region IV, Water Management Division Ground-Water Protection Branch Underground Injection Control Section 345 Courtland Street, NE Atlanta, Georgia 30365

3. Reporting of New Wells Drilled Within the Area of Review (AOR)

Within ten (10) days after spud date, the permittee shall report to the Director by certified mail, return receipt requested, the construction plans for any new well within the AOR of the permitted facility that will penetrate the confining zone or injection zone. The permittee shall provide information on proposed construction (including location and quantities of cement), location and depth. This requirement applies to any construction activity regardless of ownership of the well.

If the construction of the new well will not protect USDWs from contamination, the Director may terminate the permit under 40 CFR §144.40(a)(3), if he or she determines that continued injection may endanger human health or the environment.

SECTION E. PLUGGING AND ABANDONMENT PLAN

Plugging and abandonment of the permitted injection well shall be in accordance with Part II, Section F, of this permit and 40 C.F.R. §146.10.

... The plugging of this injection well shall be performed in the manner described in Attachment Q of the permit application and any subsequent amendments made to Attachment Q.

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EFFECT OF PERVIT

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The permittee is allowed to engage in underground injection in accordance with the conditions of this permit. The permittee, authorized by this permit, shall not construct, operate, maintain, convert, plug, abandon, or conduct any other injection activity in a marner that allows the movement of fluid containing any contaminant into underground sources of drinking water, if the presence or that containing any contaminant into mant may cause a violation of any primary drinking water regulation under 40 CFR Part 142 or may otherwise adversely effect the health of persons. Any underground injection activity not specifically authorized in this permit is prohibited. Compliance with this permit does not constitute a defense to any action brought under the SDAN, or any other common or statutory law or regulation. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Nothing in this permit shall be construed to relieve the permittee of any duties under applicable regulations.

B. PERMIT ACTIONS

- may, for cause or upon request from the permuttee, modify, revoke and reissue, or terminate this permit in accordance with 40 CTR §§ 144.12, 144.39, and 144.40, including but not limited to the following:
- (a) Alterations. There are material and substantial alterations or additions to the permitted facility or activity which occurred after permit issuance which justify the application of permit conditions that are different or absent in this permit.
- (b) Information. The Director has received information which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and would have justified the application of different permit conditions at the time of issuance.

- (c) New regulations. The standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued.
- (d) Compliance schedules. The Director determines good cause exists for modification of a compliance schedule, such as an act of God, strike, flood, or materials snortage or other events over which the permittee has little or no control and for which there is no reasonably available remedy.
- (e) <u>Proposed transfer</u>. The Director receives notification of a proposed transfer of the permit.
- (f) Noncompliance. Noncompliance by the permittee with any condition of the permit.
- (g) Relevant facts. The permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts, or the permittee's misrepresentation of any relevant facts at any time.
- (h): Endangerment. A determination that the permitted activity endangers human health or the environment and can only be regulated to acceptable levels by permit modification or termination.

Also, the permit is subject to minor modifications for cause as specified in 40 CFR \$144.41. The filing of a request for a permit modification, revocation and reissuance, or termination, or the positication of planned changes, or anticipated noncompliance on the part of the permittee does not stay the applicability or enforceability of any permit condition.

The summittal of an updated application may be required prior to the Director granting a request for permit modification.

- compliance with the requirements and conditions of 40 CFR §144.38.
- The Director may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Sate Drinking Water Act.

Page II-3 Page II

This permit may be transferred to a new owner or operator by modification according to 40 CFR §144.41(d), if the Director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Director.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit to any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. CONFIDENTIALITY

In accordance with 40 CFR Part 2 and §144.5, any information submitted to EPA pursuant to this permit may be claimed as confidential by the submitter. Any such claim must be asserted at the time of submission by stamping the words "confidential business information" on each page containing such information. If no claim is made at the time of submission, EPA may make the information available to the public without further notice. If a claim is asserted, the validity of the claim will be assessed in accordance with the procedures in 40 CFR Part 2 (Public Information). Claims of confidentiality for the following information will be denied:

- .) The name and address of the permittee;
-) Information which deals with the existence, absence or level of contaminants in drinking water.

E. DUTIES AND REQUIREMENTS

UIC Program regulations and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an energency permit issued in accordance with 40 CFR §144.34. Any permit noncompliance constitutes a violation of the SDWA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application. Such non-compliance may also be grounds for enforcement action under RCRA.

2. Penalties for Violations of Permit Conditions. Any person who violates a permit requirement is subject to civil penalties, innes, and other enforcement action under the SDWA and may be subject to such actions pursuant to RCWA. Any person who will-rully violates permit conditions may be subject to criminal prosecution.

3. Continuation of Expiring Permits.

- (a) Duty to Reapply. If the permittee wishes to continue an activity regulated by this permit arter the expiration date or this permit, the permittee must submit a complete application for a new permit at least 180 days before this permit expires.
- Permit Extensions. The conditions of an expired permit may continue in force in accordance with 5 U.S.C. 558(c) until the effective data of a new permit, in:

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- The permittee has sucmitted a timely application which is a complete application for a new permit;
- (2) The Director, through no fault of the permittee, opes not issue a new permit with an effective date on or before the expiration date of the previous permit, and
- (3) The new permit has not been denied, or if a denial has been appealed, rimal agency action has not occurred in accordance with 40 CFR \$124.19(1)(1).
- Effect. Permits continued under 5 U.S.C. 558(c) remain fully effective and enforceable.

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- Entorcament. When the permittee is not in compliance with the conditions of the expiring or expired permit the Director may choose to do any or all of the rollowing:
- Initiate enforcement action based upon the permit which has been continued;

- (2) Issue a notice of intent to deny the new permit.

 If the permit is denied, the owner or operator would then be required to cease the activities authorized by the continued permit or be subject to enforcement action for operating without a normit:
- (3) Issue a new permit under 40 CFR Part 124 with appropriate conditions; or
- (4) Take other actions authorized by Underground Injection Control regulations.
- (e) State Continuation. An EPA issued permit does not continue in force beyond its expiration date under Federal law if at that time a State has primary enforcement authority. A State authorized to administer the UIC program may continue either EPA or State—issued permits until the effective date of the new permits, if State law allows. Otherwise, the facility or activity is operating without a permit from the time of expiration of the old permit to the effective date of the State—issued new permit.
- Need to Halt or Reduce Activity not a Defense. It shall not be a defense, for permittee in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 5. Duty to Mitigate. The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
- times properly operate and maintenance. The permittee shall at all of times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.

- Duty to Provide Information. The permittee small furnish to the Director, within a time specified, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.
- 8. Inspection and Entry. The permittee shall allow the Director, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
- (a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by SDWA, any substances or parameters at any location.

9. Records.

- (a) The permittee shall retain records and all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit for a period of at least five years from the date of the sample, measurement or report.
- (b) The permittee shall maintain records of all data required to complete the permit application form for this permit and any supplemental information submitted under 40 CFR \$144.31 for a period of at least five years from the date the application was signed. These periods may be extended by request of the Director at any time.

- (c) The permittee shall retain records concerning the nature and composition of all injected fluids until three years after the completion of plugging and abandonment which has been carried out in accordance with the attached plugging and abandonment plan, and is consistent with 40 CFR \$146.10.
- (d) The permittee shall continue to retain such records after the retention period specified by paragraphs (a) to (c) above, unless he delivers the records to the Director or obtains written approval from the Director to discard the records.
- (e) Records of monitoring information shall include:
- The date, exact place, and time of sampling or measurements;
- (2) The individual(s) who performed the sampling or measurements;
- (3) A precise description of both sampling methodology and the nandling (custody) or samples;
- (4) The date(s) analyses were performed;
- (5) The names of individual(s) who performed the analyses;
- (6) The analytical techniques or methods used; and
- (7) The results of such analyses.
- Honitoring. Samples and measurements taken for the purpose of monitoring small be representative of the monitored activity. Monitoring results shall be reported at the intervals specified in Part I of this permit.
- 11. Signatory Requirements.
- (a) All reports or other information, required to be submitted by this permit or requested by the Director, shall be signed and certified in accordance with 40 CFR \$144.32, as follows:

- officer. For the purpose of this permit, a responsible corporate officer means: (1) a president, secretary, treasurer or vice president of the comporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation, or (2) the manager of one or more manufacturing, production or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding 25 million (in second quarter 1960 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporation procedures.
- (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
- (3) For a municipality, State, Federal, or other public agency: by elemen a principal executive officer or ranking elected official: or
- (4) A duly authorized representative.
- A person is a duly authorized representative only if:

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- (1) The authorization is made in writing by a person described above;
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, or position of equivalent responsibility. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and
- (3) The written authorization is submitted to the Director.
- (c) If an authorization under paragraph (b) above is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a

Page II-9

new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Director prior to or together with any reports, information, or applications to be signed by an authorized representative.

(d) Any person signing a document under paragraphs 11(a) or 11(b) of this Section shall make the following certification:

"I certify under penalty of law that this document and all attackments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, there accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

12. Reporting Requirements.

- (a) Planned Changes. The permittee shall give written notice to the Director, as soon as possible, of any planned physical alterations or additions to the permitted facility.
- (b) Anticipated Monocompliance. The permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
- (c) Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 30 days following each schedule date.

(d) Twenty-four Hour Reporting.

1) The permittee shall report to the Director any non-compliance which may endanger health or the environment. Any information shall be provided orally

within 24 hours from the time the permittee becomes aware of the circumstances. The following shall be included as information which must be reported orally within 24 hours:

- i) Any meritoring or other information which indicates that any contaminant may cause an endangement to an underground source of drinking water.
- (ii) Any noncompliance with a permit condition, or malfunction of the injection system, which may cause fluid migration into or between underground sources of drinking water.
- (2) A written submission shall also be provided within five days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
- (e) Other Non-Compliance. The permittee shall report all other instances of noncompliance not otherwise reported at the time monitoring reports are submitted. The reports shall contain the information listed in Part II, Section E, Item 12(d)(2) above.
- (f) Other Information. When the permittee becomes aware that he railed to submit any relevant facts in the permit application or submitted incorrect information in a permit application or in any report to the Director, the permittee shall submit such facts or information within 10 days.

PLUGGING AND ABANDOMENT

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1. Notice of Plugging and Abandonment. The permittee shall notify the Director no later than 45 days before conversion or abandonment of the well. The Director may allow a shorter notice period upon written request.

G. MECHANICAL INTEGRUTY

- 1. Stardards. All injection well(s) must have and maintain mechanical integrity consistent with 40 CFR §146.8.
- 2. Prohibition Without Demonstration. The permittee shall not commence or continue injection activity after the effective date of this permit unless the permittee has demonstrated that the well covered by this permit has mechanical integrity in accordance with 40 CFR §146.8 and the permittee has received written notice from the Director that such demonstration is satisfactory.
- of mechanical integrity Demonstrations. A demonstration of mechanical integrity in accordance with 40 CFR §146.8 shall be made no later than five years from the date of the last approved demonstration. Mechanical integrity shall also be demonstrated any time the tubing is removed from the well, the packer is reset, or a loss of mechanical integrity becomes evident during operation. Furthermore, the Director may by written notice require the permittee to demonstrate mechanical integrity at any time. The permittee shall notify the Director of his intent to demonstrate mechanical integrity at least 30 days prior to such demonstration. The Director may allow a shorter time period if it would be sufficient to enable EPA to adequately respond. The permittee shall report the results of a mechanical integrity demonstration within 90 days after completion and in accordance with Part II, Section E, item 11.
- Director finds that the well fails to demonstrate mechanical integrity during a test, or a loss of mechanical integrity as defined by 40 CFR §146.8 becomes evident during operation, the injection operation shall be halted immediately and shall not be resumed until the Director gives approval to recommence injection.
- plan for logging and testing the well for mechanical integrity Test (MIT). A plan for logging and testing the well for mechanical integrity shall be prepared and submitted for the Director's approval at least 60 days prior to each proposed MIT demonstration date. The Director may allow a shorter time period if it would be sufficient to enable EPA to adequately respond.

The plan shall propose logs and tests specified in 40 CFR §146.8 (as amended from time to time by EPA to include additional approved logs and tests, as published in the Federal Register). The plan shall also propose standards that will be used for evaluating the results of logging and testing. Mechanical integrity will be confirmed if the well logs and test data meet or exceed the standards approved as a result of the Director's review of the plan.

PART II Page II-13

H. FINANCIAL RESPONSIBILITY

pinancial Responsibility. The permittee shall maintain continuous compliance with the requirement to maintain financial responsibility and resources to close, plug, and abandon the underground injection well(s). The permitte shall not substitute an alternative demonstration of financial responsibility from that which the Director has approved, unless he has previously submitted evidence of that alternative demonstration to the Director and the Director notifies him that the alternative demonstration of financial responsibility financial responsibility acceptable. The Director may, on a periodic basis, require the holder of a permit to revise the estimate of the resources needed to plug and abandon the well to reflect inflation of such costs and a revised demonstration of financial responsibility, if necessary.

2. Insolvency. In the event of:

- (a) the bankruptcy of the trustee or issuing institution of the financial mechanism, or
- (b) suspension or revocation of the authority of the trustee institution to act as trustee, or
- (c) the institution issuing the financial mechanism loses its authority to issue such an instrument, the permittee must notify the Director, within ten (10) business days. The owner or operator must establish other financial assurance or liability coverage acceptable to the Director, within 60 days after such an event.

An owner or operator must also notify the Director by certified mail of the commencement of voluntary OR INVOLUNTARY proceedings under Title 11 (Bankruptcy), U.S. Code naming the owner or operator as debtor, within 10 business days after the commencement of the proceeding. A guarantor of a corporate guarantee must make such a notification if he is named as debtor, as required under the terms of the guarantee.

I. DEFINITIONS

All terms used in this permit, if not specifically defined in the permit, are defined at 40 C.F.R. Parts 144, 145, 146 and 147.



ATTACHMENTS



ATTACHMENT A

AREA OF REVIEW

The area of review chosen for the IMCO injection well is a fixed radius of 1/4 mile from the well site. The well site and the area of review are shown on Figure B-1.

ATTACHMENT B MAPS OF WELLS/AREA AND AREA OF REVIEW

Figure B-1 shows the location of the injection well, property line, the area of review and the 1-mile radius. The map also shows the strip mines (coal), gravel pits and wells drilled in the vicinity of the injection well. The IMCO plant and landfill facilities are built near and on an abandoned strip mine.

A possible fault is mapped about 1.5 miles south of the injection well (Figure B-1)

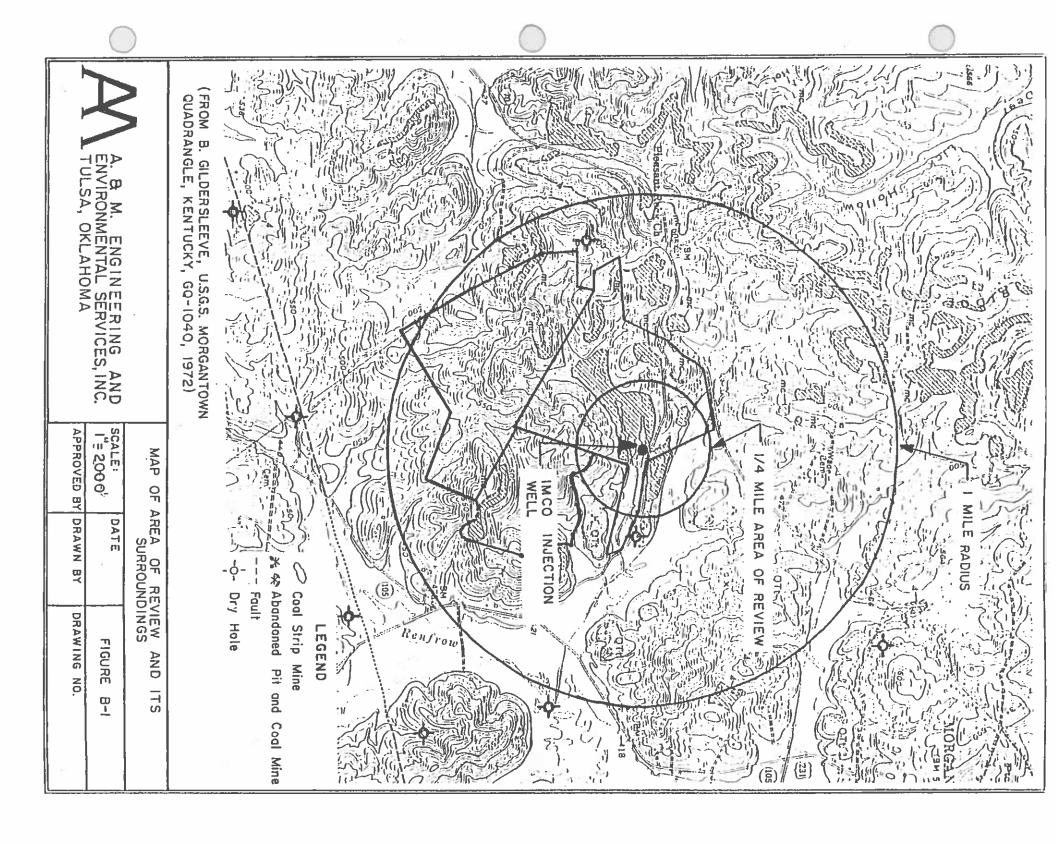
Two small streams are present within the area of review. One of these is to the north of the injection well and the other south of it. These two streams flow east and southeast to merge to Renfrow Creek.

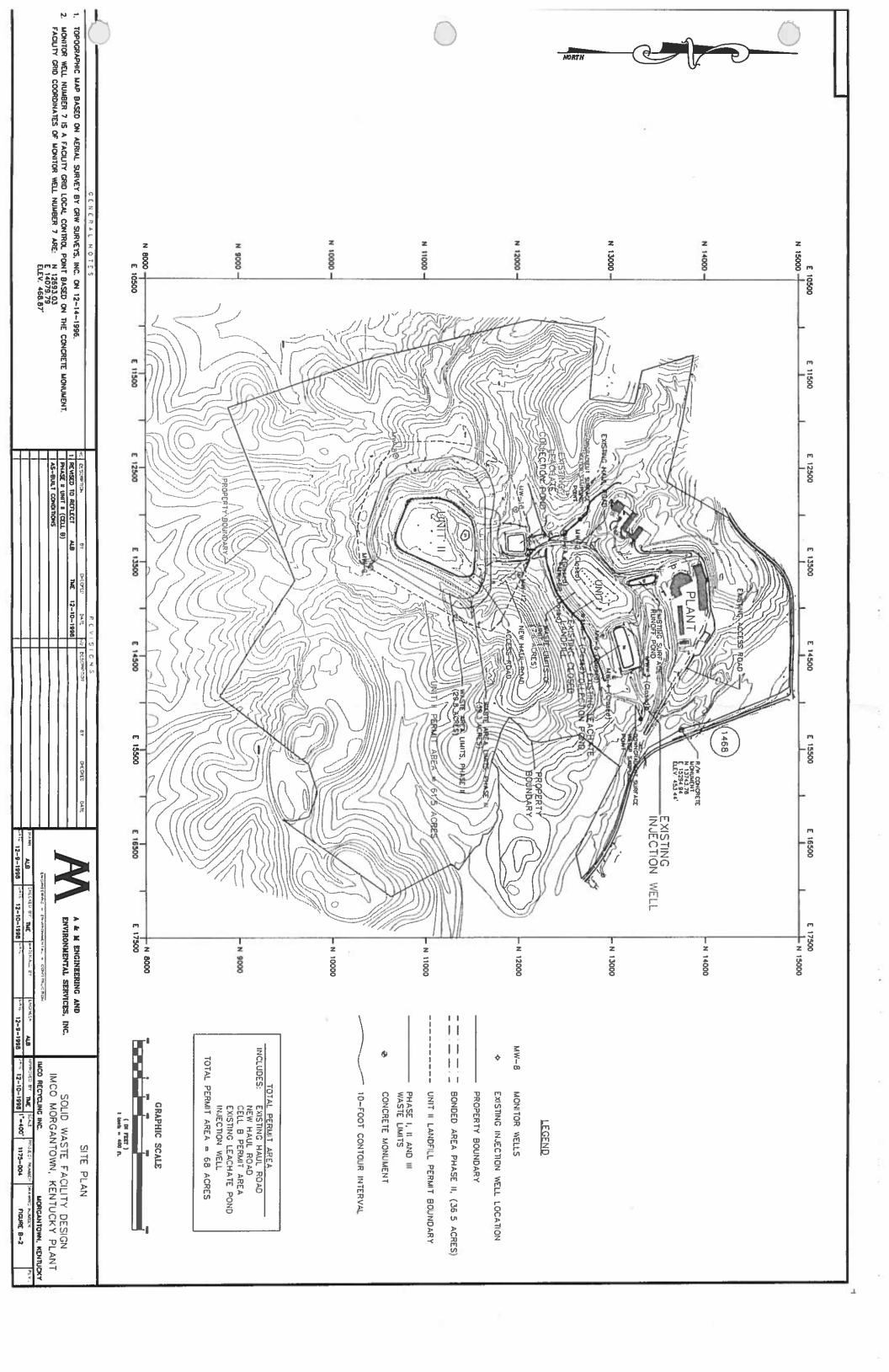
No drinking water wells are located in the area of review. There are four drinking water wells in the 1/2-mile radius of the IMCO property. The data pertinent to these wells are shown below:

- Exie Hawes, 1897 Rochester Road
 Located 1,800 feet north of the site
 Depth of the well: 25 feet
- Casey Johnson, 437 Garden Camp Road Located 2,000 feet east-southeast of the site Depth of well: 38 feet
- 3. Hal and Betty Neal, P.O. Box 21
 Located 2,200 feet southeast of the site
 Depth of well: 75 feet
- 4. Henry Meredith, Jr., 403 Garden Camp Road Located 1,600 feet southeast of the site

Depth of well: 120 feet

Figure B-2 shows a detailed topographic map of the IMCO property and the facilities. The plant site is located to the north of the property and two non-hazardous solid waste landfills are constructed in the south. The landfills have a double synthetic liner and both are equipped with a drain system, leachate collection system and leak detection system. The leachate from the landfills is collected in two ponds with synthetic liner (Figure B-2). Twelve groundwater monitor wells were installed for the landfills and leachate collection ponds; and recently (October 2000) seven of these wells were plugged and abandoned. These are shown on Figure B-2.







ATTACHMENT C CORRECTIVE ACTION PLAN AND WELL DATA

No wells are present in the 1/4-mile radius area of review with the exception of the shallow (40' to 110' deep) monitor wells of the IMCO solid waste landfills.

In a 1-mile-radius area, there are two deep wells, but in 1.5-mile-radius, seven wells (Fig. B-1) These wells, drilled for oil and gas, are all dry and abandoned. The data from these wells are tabulated in Table C-1 and copies of the records are included as Appendix A. None of the wells penetrated the injection zone (Devonian-Silurian-Ordovician carbonates), and the confining zone (Devonian New Albany Shale).

The only well to penetrate the proposed injection zone is located about three miles northwest of the IMCO injection well in Section 9, I-33, Butler County (G. Orange #1). This well is also dry and abandoned.

Therefore, there is no need for a corrective action plan.

TABLE C-1 LIST OF WELLS IN 1.5-MILE-RADIUS OF IMCO INJECTION WELL MORGANTOWN (BUTLER COUNTY), KENTUCKY

Well Name	Location	Total Depth (ft.)	Drilling Date	Formation at TD	Status	Plugging
1)Paul Ingram #1	Sec.12, I-34, 2000' FNL, 2200'FWL	1770	1976-78	Mississippian Ls.	Dry	Yes
2)Producers Pipe Line #1	Sec.8, I-34, 1300' FSL, 750' FEL	1544	1955-56	Mississippian Ls.	Dry	Yes
3)Forsythe-Nel #1	Sec.12, I-34, 11950' FSL, 9310 FEL	1114	?	Mississippian Ls.	Dry	Yes
4)George Nelson #1	Sec. 18, I-34, 9800' FSL, 8800' FEL	1511	1956	Mississippian Ls.	Dry	Yes
5)George Nelson #1	Sec.18, I-34, 8200' FSL, 11200' FEL	934	1957	Mississippian Sh-Ss	Dry	Yes
6)Hopen Shearer #1	Sec. 17, I-34	940	?	Mississippian Ls.	Dry	Yes
7)Ruby Wade #1	Sec.13, I-34, 14240' FSL, 12740' FEL	850	1962	Mississippian Ls.	Oil	?



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ATTACHMENT D USDW (Underground Sources of Drinking Water)

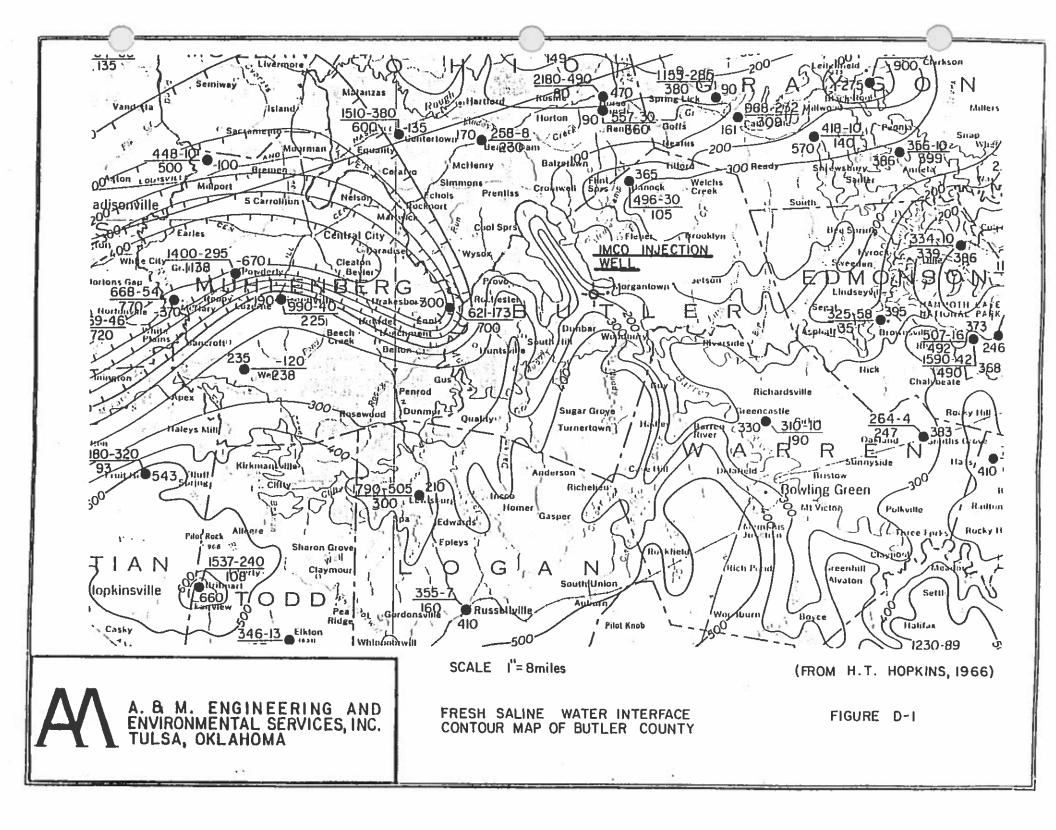
Drinking water sources in the vicinity of the IMCO site are the Pennsylvanian sandstone units and the alluvial deposits of the Green River and its tributaries.

Water-bearing Pennsylvanian sandstone units range in depth from 20 feet to 300 feet in the vicinity of the IMCO injection well. In the R. Wade #1 well (Section 13, I-34) located 2,000 feet east of the IMCO well, the water-bearing Pennsylvanian sandstones were encountered at a depth of 60 feet, 205-250 feet and 300-316 feet. The bottom of the lower most sandstone has a datum elevation of 119 feet above mean sea level. Well record of the R. Wade #1 is included in Appendix A. In the IMCO injection well, two sandstone zones with low conductivity, high resistivity are encountered at depths of 96-116 and 230-260 feet.

Figure D-1 is a map of fresh saline water interface of Butler County and surrounding counties, taken from H. T. Hopkins (1966). According to this map, the fresh saline water interface in the vicinity of the IMCO injection well is at datum elevation of 200-250 feet mean sea level.

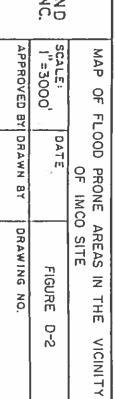
The surface casing (9 5/8") is set at a 471 foot depth, about 271 feet below the fresh saline water interface and about 211 feet below the water-bearing sandstone unit of Pennsylvanian.

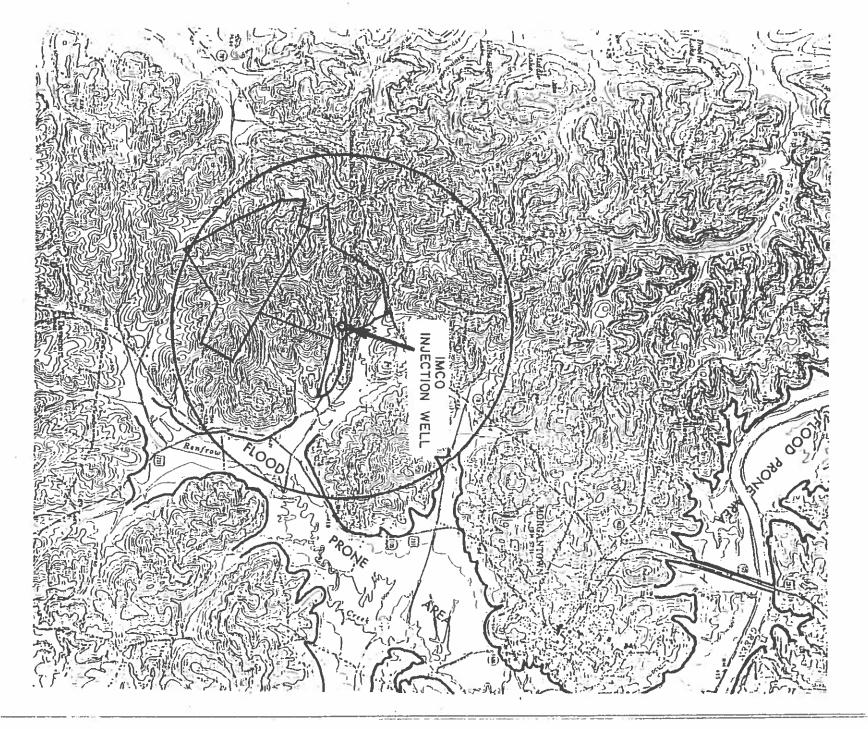
Figure D-2 shows the flood prone areas in the vicinity of the IMCO injection well.



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ATTACHMENT E
NOT APPLICABLE

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ATTACHMENT F MAPS AND CROSS-SECTIONS OF GEOLOGIC STRUCTURE OF AREA

Regional Geologic Setting:

The site of the IMCO injection well is located in the southeastern flank of the Moorman Syncline (Figure F-1). The Moorman Syncline is part of the Eastern Interior basin and it is bounded by two major fault zones, the Rough Creek fault zone to the north and the Pennyrile fault zone to the south. The Moorman Syncline trends east-west and deepens westward. The syncline is filled with over 10,000 feet of thick sediments of Paleozoic and possibly Precambrian.

The Rough Creek fault zone strikes east-west for over 175 miles in western Kentucky and extends into southern Illinois. The fault zone is about 15.5 miles wide. The fault zone consists of both high angle normal faults and reverse faults. The highest cumulative displacement (throw) across the fault zone is about 2,000-2,500 feet, down to the south.

The Pennyrile fault zone also extends east-west, and it terminates just east of Butler County. The Pennyrile fault zone is less pronounced than the Rough Creek fault zone. The Pennyrile fault zone consists of vertical to high-angle normal faults with down-to-the-north displacement. The cumulative displacement across the fault zone is about 500 feet, but it may increase to 1,000 feet in extreme western Kentucky.

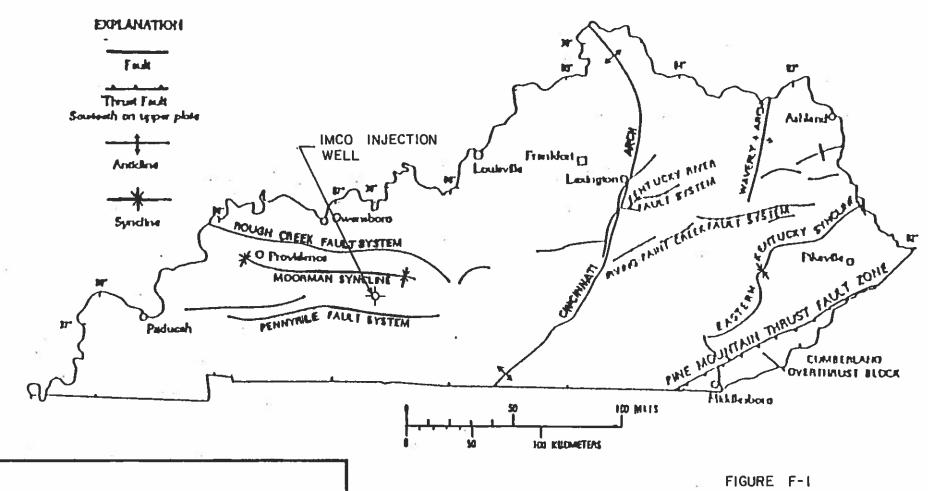
Stratigraphy of the Site:

The consolidated surface strata at the site are of the Pennsylvanian Tradewater Formation. The section contains coal beds which were strip-mined at the site.

The stratigraphic column of the site was prepared by using data from the IMCO well, the wells drilled in the vicinity of the IMCO injection well and from the deep wells in the region as well as information from Gildersleeve, 1972, Schwalb, 1975 and Townsend and Cordiviola, 1982. Figure F-2 shows the stratigraphic column of the site.

The Pennsylvanian section (Tradewater and Caseyville Formations) is composed of shale, siltstone and sandstone with coal seams and occasional thin limestone beds. The coal seams range from 0-48 inches in thickness. The coal previously exposed at the surface in the area of review have been mined by strip-mining. The total thickness of the Pennsylvanian section in the area of review is about 525 feet and 446 feet in the IMCO well. An erosional unconformity separates the Pennsylvanian strata from underlying Mississippian rocks.

Generalized Structure Map of Kentucky



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The Mississippian rocks are exposed about four miles south of the IMCO site, along the Pennyrile fault zone. The upper Mississippian section (Chester Series) is composed of alternating limestone, shale and sandstone. The thickness of the Chester Series is about 925 feet and only 764 feet in the IMCO well. The units of the Chester Series have produced most of the gas and oil in Butler County.

The lower Mississippian section (Kinderhook-Osage-Meramec Series) is mainly limestone with thin shale streaks, with the exception of the lower most two formations, Fort Payne and New Providence. The Fort Payne Formation consists of limestone in the upper two-thirds and mainly shale with limestone interbeds in the lower one-third, but in the IMCO well, the lower part is shaley limestone. The total thickness of Kinderhook-Osage-Meramec Series is about 925 feet in the area, and 1123 feet thick in the IMCO well. The Kinderhook Series conformably overlies the Upper Devonian New Albany (Chattanooga) Shale.

The New Albany (Chattanooga) Shale consists of dark brown to black, carbonaceous and pyritic shale. The shale contains spores and amber and is silty in some zones. The New Albany Shale widely extends in the subsurface and it is 162 feet thick at the site. The thickness increases westward. The New Albany Shale unconformably overlies the older Devonian rocks. The New Albany Shale together with the overlying shaley Fort Payne sections form a thick (300 feet) confining layer in the IMCO injection well.

The Lower-Middle Devonian section is mainly limestone with a thickness of 548 feet. The limestone is generally light colored and it is glauconitic, sandy, cherty or dolomitic in some zones.

The Silurian section is mainly carbonate with shale units in the upper part. The carbonates are usually light colored limestone and dolomite. The thickness of the Silurian section is 487 feet. The Silurian rocks unconformably overlie the Ordovician Leipers Formation.

The Upper Ordovician Leipers Formation varies in lithology in the region. In the IMCO injection well, it consists of gray, dark gray, calcareous shale, dolomitic limestone, limestone and siltstone. The siltstone is penetrated at the base of the Leipers Formation and in a well located about nine miles northwest of the IMCO site. The Leipers is 270 feet thick.

Below the Leipers Formation, the Ordovician section (Kimmswick, Plattin, Pectonica and Joachim Formations) is generally limestone and dolomite. The Ordovician-Cambrian Knox Group unconformably underlies the Joachim Formation. The Knox Group is mainly dolomite. The IMCO injection well is completed in the Knox Group at a depth of 4700-6450 feet.

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A. & M. ENGINEERING AND ENVIRONMENTAL SERVICES, INC. TULSA, OKLAHOMA		ORDOVICIAN	SIL DEVONIAN	MISSISSIPPIAN	SYSTEM PENNSYLVANIAN
VICES, INC.		KIMMSVICK PLATTIN- PECUTUNICA JUACHIM KNUX DULUMITE	FORT PAYNE NEW ALBANY N. VERNON- JEFFERSONVILLE GRASSY KNOB BAILEY LEIPERS	MERAMEC SERIES ST. GENIEVE	Formation
APPROVED BY					Lithology
DRAWN BY	STRATIGRAPHIC	Passen Injection 4703—	Confining (Sea		Remarks
FIGURE F.	COLUMN	2 4690 ion Zone 3 - 6457 lle 1" = 80 ft.	ining Zone (Seal)		
F-2			•		

Underlying the Knox Group, at least 2000 feet thick sedimentary section of Cambrian age is expected.

Local Structure of the Area of Review and Its Surroundings:

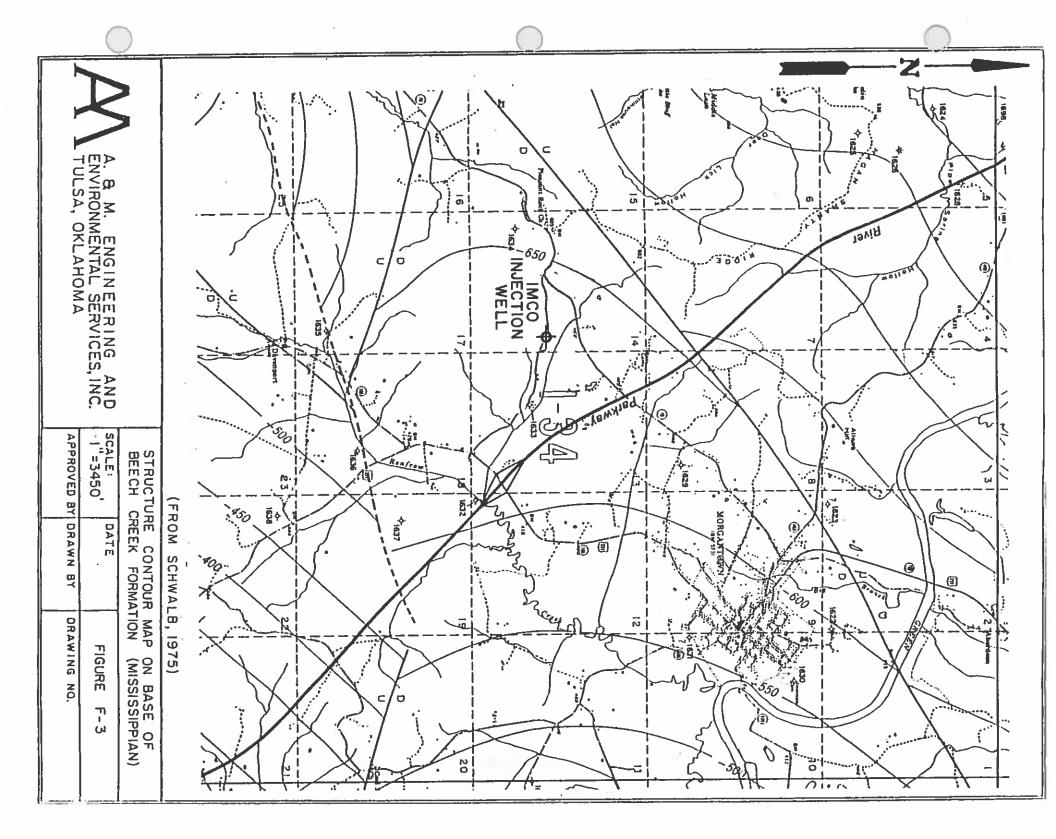
The bedrock at the site is horizontal or dips gently to the north. Faulting at the surface is observed about 3.5-4 miles south of the site. However, a fault inferred from subsurface information is located about 1.5 miles south of the site.

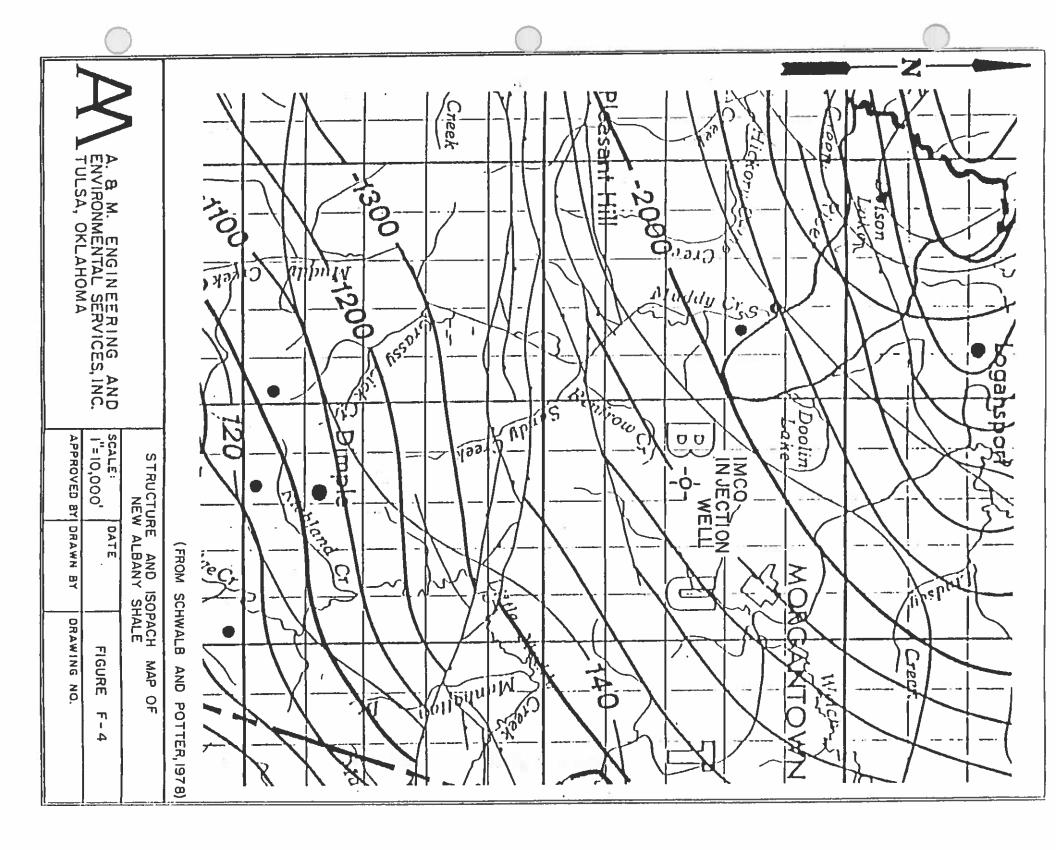
Figure F-3 shows structure on the base of the Mississippian Beech Creek Formation. The location of the IMCO injection well is on a faulted and westward-dipping nose structure.

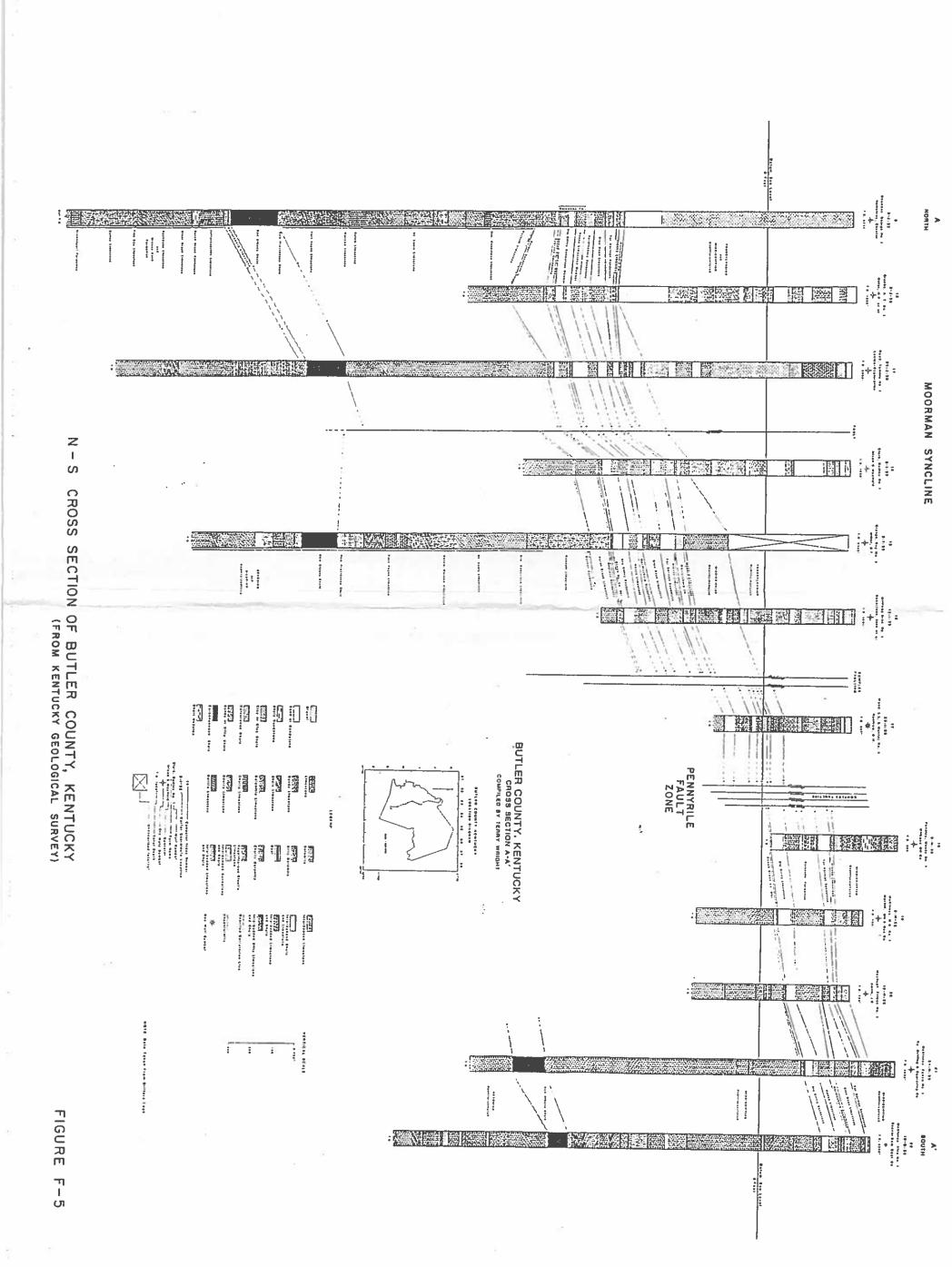
Figure F-4 is an isopach and structure map of the New Albany Shale. The IMCO injection well is located on the southeastern flank of the Moorman syncline. Thus, the shallow nose structure does not extend down to deeper sections.

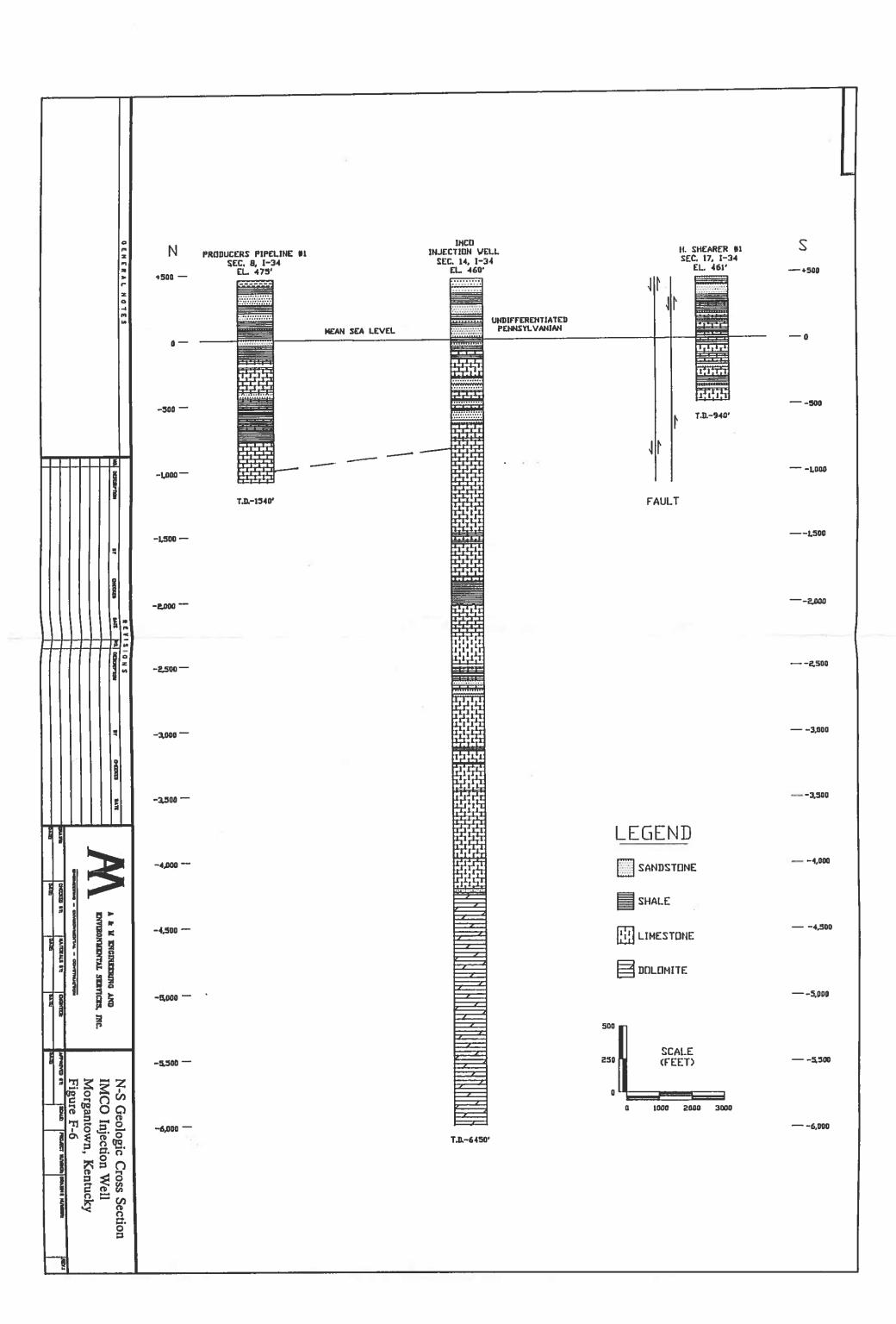
Figure F-5 shows a regional north-south geologic cross-section of Butler County. The cross-section is about 3-4 miles west of the IMCO site.

Figures F-6 and 7 are cross-sections showing the local structure at the IMCO site. The locations of the cross-sections are shown on Figure F-8. All the cross-sections show clearly that the strata dip gently northward and westward toward the Moorman Syncline axis. There is no structural complexity in the vicinity of the IMCO injection well.

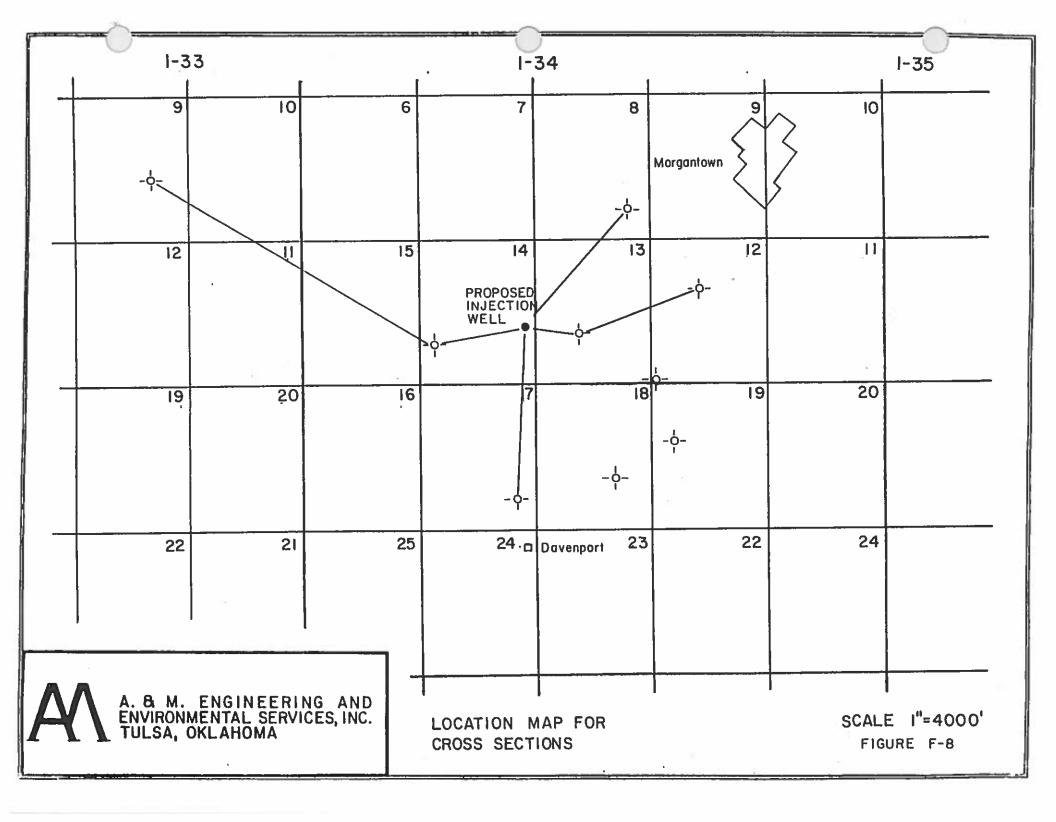








E A DUMEN OF PERSTURNITURE PERSON VINCAN **LEGEND** SAIDSTONE SHALE A & M ENGINEERING AND E LINESTONE BOLDATE W-E Geologic Cross Section IMCO Injection Well Morgantown, Kentucky Figure F-7



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NOT APPLICABLE ATTACHMENT G

ATTACHMENT H OPERATING DATA

Volume and Flow Rate of Injection Fluid:

The water to be disposed in the IMCO injection well will be runoff water from the plant site and salt-water leachate from the non-hazardous solid waste landfill.

IMCO's property in Morgantown, Kentucky is about 548 acres, but the facilities including the landfill which may produce chloride contamination is only 35 acres. The average yearly precipitation in the area is about 3.3 feet. For purposes of calculation of maximum value, a runoff factor of 1 is used.

Thus, total yearly amount of runoff water from the 35 acres will be: Q = CAP

 $Q = 1 \times 35 \times 3.3 = 115.5$ acre feet

Converting acre feet to gallons:

 $115.5 \times 325,836 = 37,634,058 \text{ gallons/year}$

Considering 80% efficient injection time throughout the year, it will give:

 $365 \times 0.8 = 292 \text{ days}$

01

 $292 \times 1440 = 420,480$ minutes of injection time

Then the needed average injection flow rate to handle the non-hazardous runoff water and leachate will be:

This value considers zero annual evaporation of water. However, taking into consideration the wet years (above average precipitation), the maximum injection flow rate would be 120 gallons per minute. The injection rate of 120 gallons per minute would handle a yearly precipitation of 4.4 feet.

In summary:

Average flow rate = 90 gal/min = 129,600 gal/day = 3,086 bbl/dayMaximum flow rate = 120 gal/min = 172,800 gal/day = 4,114 bbl/day

5000 bb// day

Injection Pressure:

IMCO Recycling Inc. conducted an acid job on the injection zone (Knox dolomite) during construction of the injection well. During the acid job, the acid injection pressures were about 3000 psi at wellhead. However, there was no fracturing in the formation. After this acid job, an injection test was conducted. The results of both acid job and injection test were submitted

pressure and to modify the original permit. to U.S. EPA Region IV on January 23, 1992 to determine the maximum allowable injection

data. operate the IMCO injection well with 2,700 psi wellhead pressure, based on the submitted U.S. EPA Region IV responded on February 5, 1992 allowing IMCO Recycling Inc. to

Average Injection Pressure:

The average injection pressure could be determined by using the formula of pressure rise in the injection zone. The same formula also gives approximate lifetime of the well. The formula is:

$$\Delta P = \frac{162.6xQxu}{Kxb} x \left(\log \frac{Kxt}{\Phi x u x C x r^2} \right)$$

where

Q = flow rate, in bbl/d (90 gal/min = 3085.7 bbl/d)
u = viscosity of fluid, 0.8 centipoise
K = average permeability of injection zone, 8 millidarcies

b = effective thickness of injection zone, 850 feet C = reservoir compressibility, 7.5 x 10⁻⁶ psi

r = well radius of injection zone, 0.26 feet

 \circ = average porosity of injection zone, 8% = 0.08

t = time of injection in hours

Solving the formula for the above values, the following results are obtained:

Time (t), hours	Cumulative pressure rise in injection zone (ÄP)
4,3803 (0.5 year)	519.43 psi
8,760 (1 year)	537.14 psi
43,800 (5 years)	578.64 psi
87,600 (10 years)	596.17 psi
175,200 (20 years)	613.88 psi
350,400 (40 years)	631.58 psi

The above calculation results indicate that the average injection pressure will rise about 600 psi and the tested injection pressure for 90 gpm was about 1200 psi. That will put the injection pressure at 1800 psi after 40 years' injection. This injection pressure is below the allowed 2700 psi injection pressure. However, during the eight years of operation, the pressure rise is much lower, due to at least much lower injection rate.

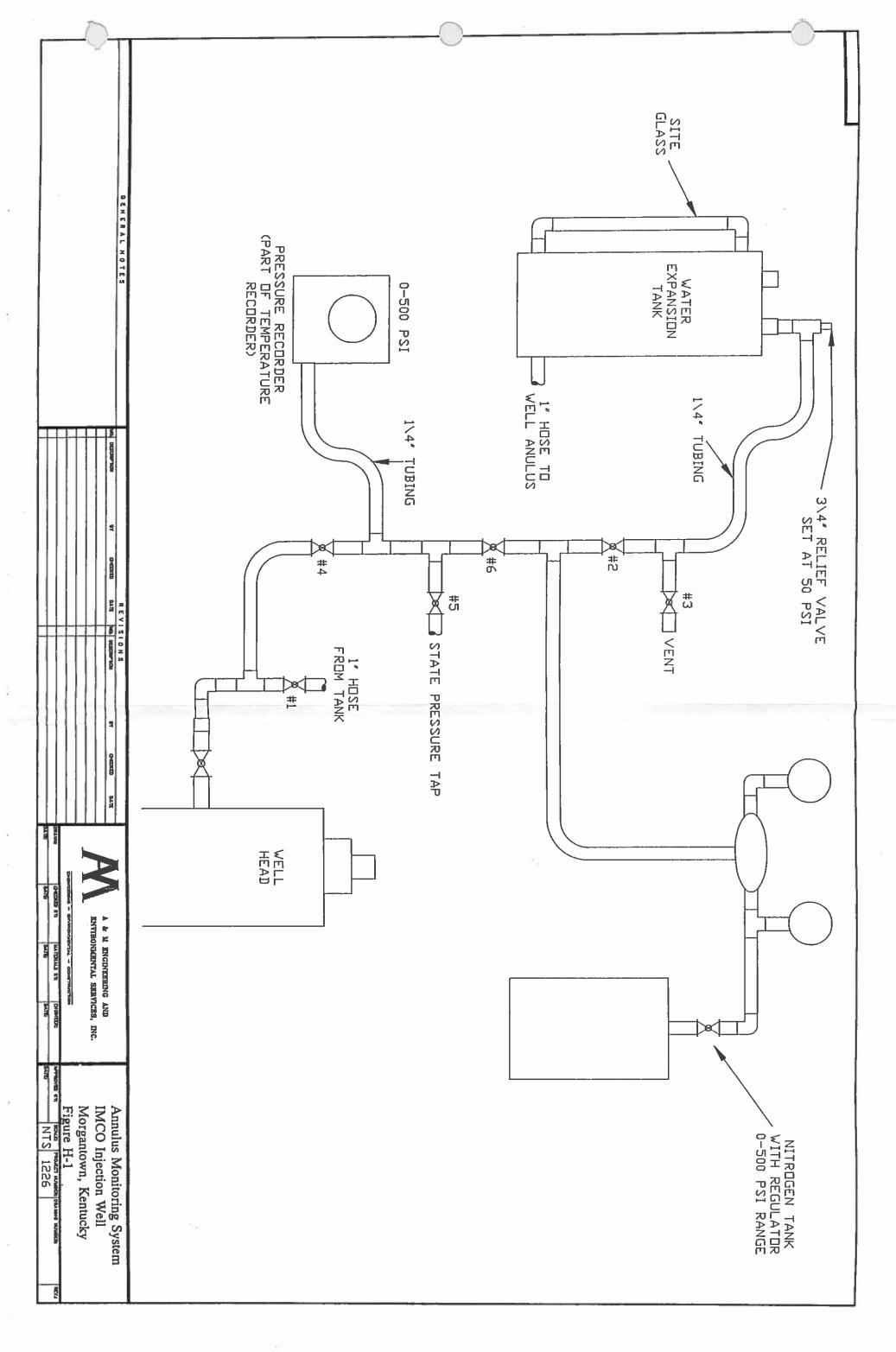
Annulus Fluid:

The annulus is filled with water containing corrosion inhibitor (Halliburton Anhib, see Exhibit H-1). The annulus fluid is pressurized to over 10 psi but less than 50 psi and monitored continuously. The annulus monitoring system is shown on Figure H-1.

Injection Fluids:

The only fluids to be injected into the IMCO injection well are the chloride contaminated runoff water from the plant site and leachate from the solid waste landfill which are collected in adjacent ponds.

Chemical analysis reports of the solid waste (baghouse dust and salt cake) and leachate are included in Appendix B. The solid waste has high chloride and sodium concentrations. Besides these two non-hazardous contaminants, there are no other potential contaminants. Leachate analysis shows presence of same parameters (sodium and chloride).



-

EXHIBIT H-1

ANNULUS FLUID CORROSION INHIBITOR
DATA



CHEMICAL

TECHNICAL DATA

Packer Fluid Corrosion Inhibitor

Halliburton Services ANHIB corrosion inhibitor is designed for use in aqueous fluids for placement in the ennular spece between tubing and casing or behind casing. As a multicomponent system, ANHIB inhibitor can be used in place of high pH chromate used with bactericide. It is effective against baxygen, hydrogen sulfide and carbon dioxide corrosion.

Chemical Properties

Competibility	-1 (2) to 12	Corresion Inhibition	ธีอาสาราร์เปล	Охурал Scavanger
ANHIB is competible with most Helliburton crosslinked gels which may be used as light weight annular, packer or completion fluids as well as Halliburton's Hydrowate fluid.	Reduces surface tension of see water containing 1,000 ppm ANHIB inhibitor to 40.5 dyna/cm.	Reduces oxygen corrosion by removing the oxygen. Minimizes corrosion by ${\rm CO_2}$ and ${\rm H_2S}$. (See Tables 1 and 11)	Excellent bactericide for sulfate reducing bacterie at 40 ppm, however, for quick kill 500 ppm is recommended.	Requires a minimum concentration of 500 ppm (1/2 gal/1000 gal) to completely remove all oxygen from air saturated water. It is somewhat slower to pick up oxygen than most scavengers and is therefore less prone to loss while mixing, however careful mixing procedures should be followed.

Senstits

Stability

ANHIB is stable up to at least 300°F in brine solutions. (See Table III)

- No pH adjustment required
- · Reduced effect with hydrogen suffice contamination
- Compatible with most brine or salt solutions
- Slow axygen pickup
- Compatible with gels and crosslinked gels

Mixing Procedura

ANHIB corrosion inhibitor is readily soluble in most brines and sesily soluble in a 2 percent KCI solution. This will help reduce mixing problems; however, it is an effective oxygen scavenger and will pick up oxygen from the air. It should be added with a minimum of agitation and preferably introduced below fluid level to minimize contact with air. It can be metered into the fluid as it is being pumped into the well.

Concentrations

ANHIB inhibitor can be used at a concentration as low as 500 ppm, (1/2 gel/1,000 gal); however, the standard recommendation is 5 gallons per 100 bbls, (1,190 ppm). At temperatures above 200°F the use concentration should be 10 gal per 100 bbls, (2,380 ppm). (ANHIB contains a red dye and can be seen in tap water at a concentration of 200 ppm).

Special Application

Gailed fluids are sometimes placed behind the intermediate string of pipe rather than dement to allow pipe recovery at some later date. The get will remain behind the iong string for es long as the well is produced and should be properly inhibited to protect the pipe from corrosion. Most corrosion inhibitors are not compatible with the crosslinked gels recommended for this application. ANHIB was specifically designed to be compatible with these crosslinked gels used as annular fluids behind desing.

ANHIB inhibitor is a red colored liquid with the following physical properties:

pH 10% solution in distilled water Viscosity	Odor	Density @50°F	Specific Gravity ©60°F	Pour Point	Flash Point
8.4 64 cps @60°F	Pungent, elsohol	e.9 fts/gzł	1.07	-20°=	81°F TOC 67°F TCC

ONER BUILDE TOTAL

CO2 Corrosion Tests lable 1 Pressure bottle

Coupons: Time: Temperature: 7
Acid Gas: C Type: CO₂ @ 15 psig 7 days AISI 1020 carbon steel Tap Water*
720F

Concentration Erdd ANHIB . Corrosion Rate MPY Parcent Protection

0 (blank) · 5

50 0

*Contains a trace of oxygen when satureted with CO $_{
m Z}$

Table II

Dynamic Corrosion Tests

Corrosive Fluid: 5% NaCl saturated with H₂S Time: 1 day 100°F

Type:

Pressure bottle

High Temperature Corrosion Test

잃 밆

Percent Protection

ANHIB Concentration

20 ppm (1/50 gal/1000 gal) 9 ppm (1/20 gal/1000 gal)

ANHIB Concentration Corrodent: Oxygen seturated brine pH: 9 to 9.5
Temperature: 3000F
Time: 5 days

Percent Protection

2000 ppm (2 pal/1090 gal) 5000 ppm (10 gal/1090 gal)

72 76

*Brine contains 2% KCI adjusted to 10.2 lbs/gal with CaCl2. It was air saturated at room temperature then hazted in a closed system.

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Litho U.S.A.

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HIN THE STREET

TABLE 17

Effect of H₂S on Corrosion Inhibition 200° F (93° C)

Pressura Metal Type Test Temperature
Test Time

7.80 80

15% HCl Saturated with H2S Corresion Pale

Corrodent

HAI-35								3
HAI-30 HAI-75 HAI-75 HAI-75 HAI-76 HAI-76 HAI-77 Hb/ff' Hg/m' 1b/ff' 1b/	0.5	0,5		0.3	0.15	0.15	% inhibitor Concen.	
HAI-75 HAI-76 15/R1 15/R	0.4%SCA-130	l	0.4%SC4-130	1	0.4%SC+130	ı	Acid Add.	
HAI-75 HAI-76 15/71 15/7	0.011	800,0	0.025	0.070	0.007	0,011	ا≤"ا	
1-75 HALL 1-75 HALL 1-0,006			0.1221	0.342	0.034	0.054	1-50 kg/m²	
0.006 0.006 0.003	0,008	0.011	1100	0.052	i,	1	IB/RT	001144
- E F	0.039	0.054	0,054	0.254	1	!	-75 kg/m¹	2000
0.029 0.015	1	ı	ļ	ı	0.003	0.006	IP/RI	
	l	1	ı	ŀ	0.015	0.029	K8/m1	

"Tests Run at 150" F (65" C) on P105 Coupons

NOTH SCA-130 is not compatible with Super Acidfrac and should not be used in that system. HAI-50 and HAI-55 are also incompatible with Super

ANHIB PACKER FLUID CORROSION INHIBITOR

Introduction

between tubing and casing or behind casing. use in aqueous fluids for placement in the annular space ANHIB is a currosion inhibitor which is designed for

bactericide for sulfate reducing bacteria when used in the precommended concentration range. The normal recommended dosage for this inhibitor is 5 gallons per 100: effective against oxygen, hydrogen sulfide and carbon which can be used in place of sodium chromate. It is this inhibitor; therefore, it should be easier to use than dioxide corrosion. No pH adjustment is required with contamination occurs. This material is also an effective affected by hydrogen sulfide as the chromate system if corrosion inhibitor which will not be as adversely sodium chromate. In addition, ANHIB is an organic ANHIB is a multi component system in a single drum

bbb. (120 liters per 100m³) (approximately 1200 ppm) or 1 gallon per 1000 gallon (1 liter per 1000 l).

Materials Used in Process

following physical properties: ANHIB (Part No. 70.15341) is red colored liquid with

additional air from entering the drum. drum. The bung should be tight to prevent can. Carefully replace the bung in a 55 gallon recommended that you use all of the S

Mixing Procedure

oxygen scavenger and will pick up oxygen from the air. It before pumping should also be kept to a minimum. should be added with a minimum of agitation. Do not level to minimize beating in additional air. Waiting time use air agitation. Hoses should be introduced below fluid present no mixing problems; however, it is an effective ANHIB is readily soluble in most brines so should

pump should be satisfactory for this purpose. fluid at the pump suction as a concentrate. The hydrazine You may want to meter the material into the packer

Use Concentration

Titers in 100m³). At temperatures above about 220° F (93° C) the use concentration should be to allow the concentration should be to allow the concentration of the concentrati (240 V100m3). standard recommendation is 5 gallons in 100 bbls (120 ppm (% gal/1000 gallons) (% l /1000 l); however, the ANHIB can be used at a concentration as low as 500 the use concentration should be 10 gal/100 bbls

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ATTACHMENT I FORMATION TESTING PROGRAM

Lithology Log:

During drilling, drill cuttings were sampled at 10-foot intervals from the surface to total depth. These samples were examined by a geologist. A lithologic description and strip log are enclosed in Appendix D. The collected samples are delivered to Kentucky Geological Survey.

Pressure:

During well construction, DST's (Drill Stem Tests) were conducted to determine formation pressure and pressure gradient in the well. The first DST was run at 4750-5250 feet depth with a pressure of 2089 psi and pressure gradient of 0.435 psi/ft. The second DST was at 5250-5872 feet depth with a pressure of 2341 psi and pressure gradient of 0.442 psi/ft. The third DST was at 5900-6450 feet with a pressure of 2650 psi and pressure gradient of 0.445 psi/ft. The data related to DST's are included in Appendix E.

Temperature:

A temperature log was run and it is included in Appendix D. The bottom hole (6450 feet) temperature is 112°F. The geothermal gradient is about 0.7 to 1.0 F°/100 feet.

Formation (Injection Zone) Fluid:

During Drill Stem Tests (DST's), formation fluid was recovered and was sampled. These fluid samples were analyzed for the required parameters. The analytical reports of these samples are included in Appendix E.

The formation fluid shows stratification, as depth increases the total dissolved solids increase from 61,260 ppm to 94,040 ppm and specific gravity from 1.036 to 1.06.

The formation fluid and injectate were mixed at room temperature and at formation temperature (112°F) and there were no reactions or precipitation observed.

Swabbing:

After logging and drilling cement plugs were completed at total depth, the drilling mud was

evacuated from the well and the well was cleaned with water. After cleaning, the well was swabbed. Black, sulphur formation fluid was recovered; the same as the fluid recovered during drill stem tests.

Swabbing was also conducted after perforating the formation to clean the well.

Injection Survey:

The first injection test was conducted on December 30-31, 1991, in the well after the first clean up to determine the hydraulic conductivity of the injection zone and its acceptability of the fluid. The results are shown in Appendix F. The well was accepting fluid at a rate of 10-14 gpm with 1000 psi wellhead pressure.

The second injection test was conducted on January 17, 1992 after perforating and acidizing the injection zone. The injection test was step-rate type and the results are included in Appendix F. The injection rates and pressures were 42 gpm with 330 psi; 58 gpm with 522 psi; 84 gpm with 890 psi; 105 gpm with 1254 psi; and 150 gpm with 1984 psi. The summary data of this test is shown on Table I-1 and Figure I-1.

Injection Zone Characteristics:

The injection zone is the Knox dolomite at depth of 4705-6450 feet. The average porosity is about 10 percent. The effective reservoir thickness is approximately 600-850 feet. The porosity types are intercrystalline, fracture and vugs.

The permeability was calculated in a range of 1.6 to 50 md from the drill stem tests. However, permeability calculation from the injection test data of January 17, 1992 (after acidizing) shows it to be 6-10 md.

Transmissivity values were calculated from drill stem tests to be 229.5 md feet/cp for 4750-5250 feet, 6764.16 md feet/cp for 5250-5872 feet and 10731.6 md feet/cp for 5900-6450 feet depth. Transmissivity was calculated to be 2634.12 md ft/cp from the injection test of January 17, 1992 for all injection zones (4700-6450 feet).

Attempted to obtain core samples by sidewall coring, but after three samples were obtained at depths of 3324, 3809 and 3833 feet, the tool malfunctioned and could not complete coring.

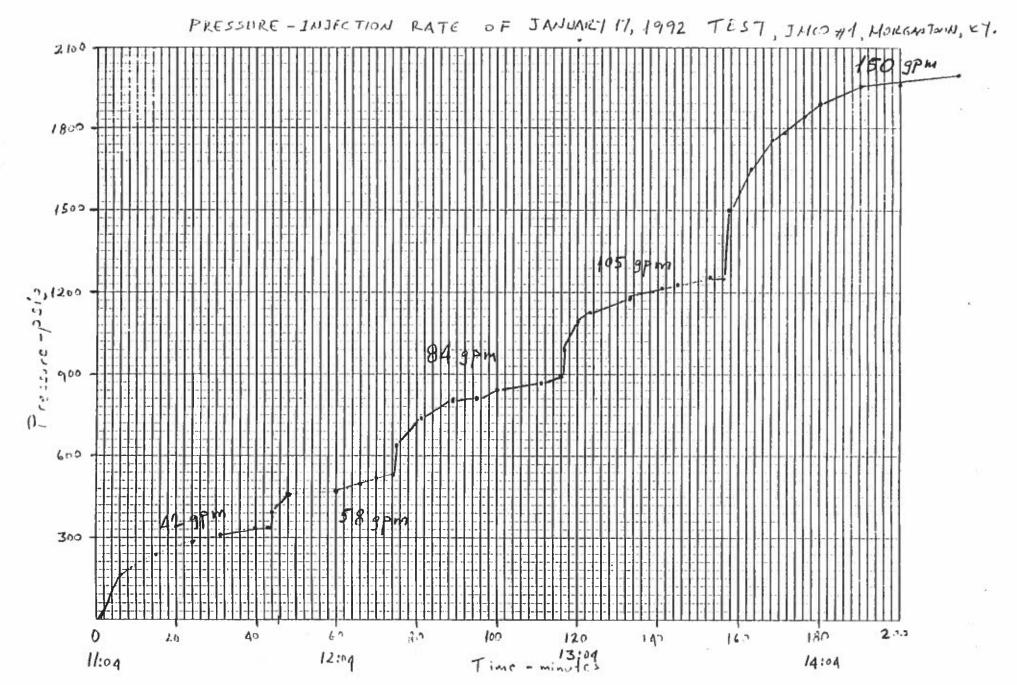
TABLE I-1
INJECTION RATES, PRESSURES AND INJECTIVITIES RECORDED
DURING THE JANUARY 17, 1992 INJECTION TEST
IMCO RECYCLING INC, MORGANTOWN, KENTUCKY

13:00	12:59	12:55	12:50	12:45	12:40	12:25	12:19	12:18	12:15	12:10	12:05	12:00	11:57	11:47	11:45	11:40	11:35	11:04 start	TIME (Hour)
106	84	84	84	84	84	84	84	59	59	59	59	59	55	55	42	42	42		INJECTION RATE (gpm)
985	888	880	867	845	821	737	632	522	515	504	466	458	440	389	331	320	304		WELLHEAD INJECTION PRESSURE (psig)
	0.094	0.095						0.113	0.114						0.126	0.131	0.138		INJECTIVITY (gpm/psi)
Rate increase							Rate increase							Rate increase					

TIME (Hour) INJECTION RATE (gpm) WELLHEAD INJECTION (gpm/psi) INJECTIVITY (Hour) (Epm/psi) INJECTIVITY (gpm/psi) 3:06 106 1124 (gpm/psi) (gpm/psi) 3:10 106 1124 (gpm/psi) (gpm/psi) 3:15 106 1123 (gpm/psi) (gpm/psi) 3:15 106 1123 (gpm/psi) (gpm/psi) 3:15 106 1123 (gpm/psi) (gpm/psi) 3:20 106 1123 (gpm/psi) (gpm/psi) 3:20 106 1233 (0.084 (gpm/psi) 3:30 106 1223 (0.084 (0.084 3:40 106 1254 (0.084 (0.084 3:40 147 1500 (0.084 (0.084 3:40 147 1887 (0.084 (0.084 3:40 147 1889 (0.084 (0.084 4:00 147 1887 (0.084 (0.084 (0.084 4:10		Instant shut-in pressure	1540	0	14:41
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10 minutes shut- in pressure	760	0	14:50
in pressure	1004		14:40
	1004	>	1 4 . 4 /1
(gpm/psi)	PRESSURE (psig)	RATE (gpm)	(Hour)
INJECTIVITY	WELLHEAD INJECTION	INJECTION	TIME

Figure I-1





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ATTACHMENT J STIMULATION PROGRAM

After the first injection test, it was recognized that the injection zone did not have the capacity needed. Thus the decision was made to perforate the zones with good potential and follow with an acid job.

The perforating job was conducted during January 5-10, 1992. The following zones were perforated with 100 gram shots, one per foot: 4894'-4904', 4996'-5024', 5148'-72', 5366'-70', 5398'-5406', 5464'-72', 5534'-52', 5570'-88', 5612'-32', 5658'-70', 5680'-90', 5712'-24' 5732'-38', 5806'-10', 5842'-66', 5910'-16', 5988'-94', 6026'-34', 6074'-84', 6128'-38', 6182'-88', 6230'-52', 6315'-30', 6358'-74', 6402'-04', 6420', 6432'-38'.

After perforating job was completed, the well was cleaned and swabbed. Then on January 15, 1992, the injection zone (4705-6450 feet depth) was acidized with 15,000 gallons 28% hydrochloric acid in five stages. Salt was used as a diverter. Acid job records are included in Appendix F. The acid job resulted in drastic improvement of the injection zone, from 14 gpm with 1000 psig wellhead pressure to 84 gpm with 888 psig wellhead pressure.

WilsonJones - Owick Relevence Index System

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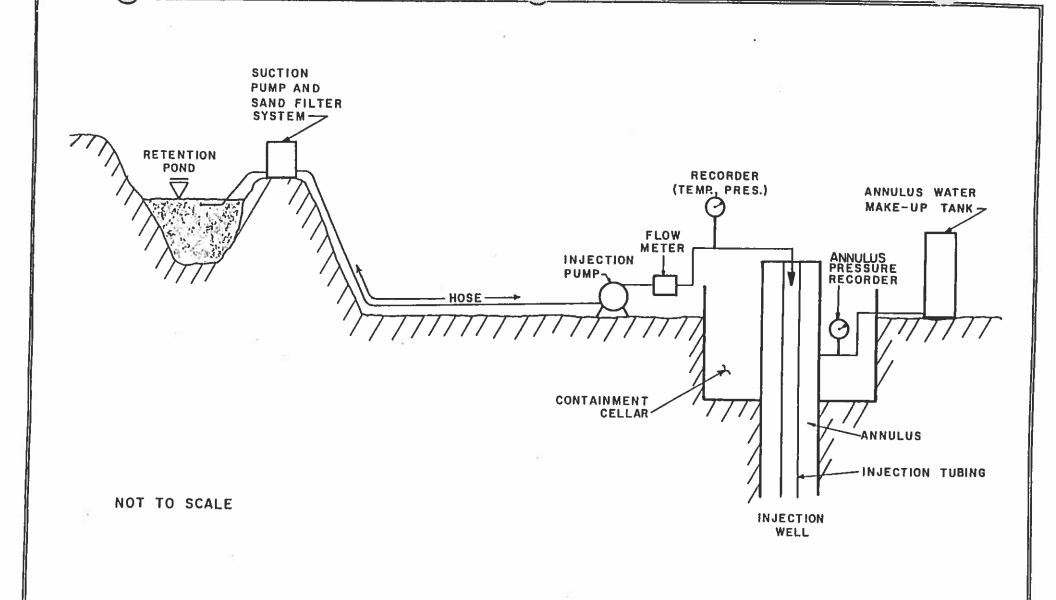
ATTACHMENT K INJECTION PROCEDURES

The injection procedure includes suction of the fluid from the retention pond and pumping it into the injection well. Figure K-1 shows schematically the surface injection system.

The suction assembly consists of: 1) screen, to prevent suspended solids; 2) hoses; 3) check valve; 4) hoses; and 5) pump. The detailed drawing of this section is shown on Figure M-2.

The water sucked from the retention pond goes through pressurized sand filters to further eliminate suspended solids in the fluid. The fluid is transported by 3" plastic hose from the sand filters to the injection pump next to the injection well. The detail of the filter system is shown on Figure M-3.

The injection pump is Wheatley Triplex Plunger pump (positive displacement pump). The pump has a capacity up to 120 gallons per minute.



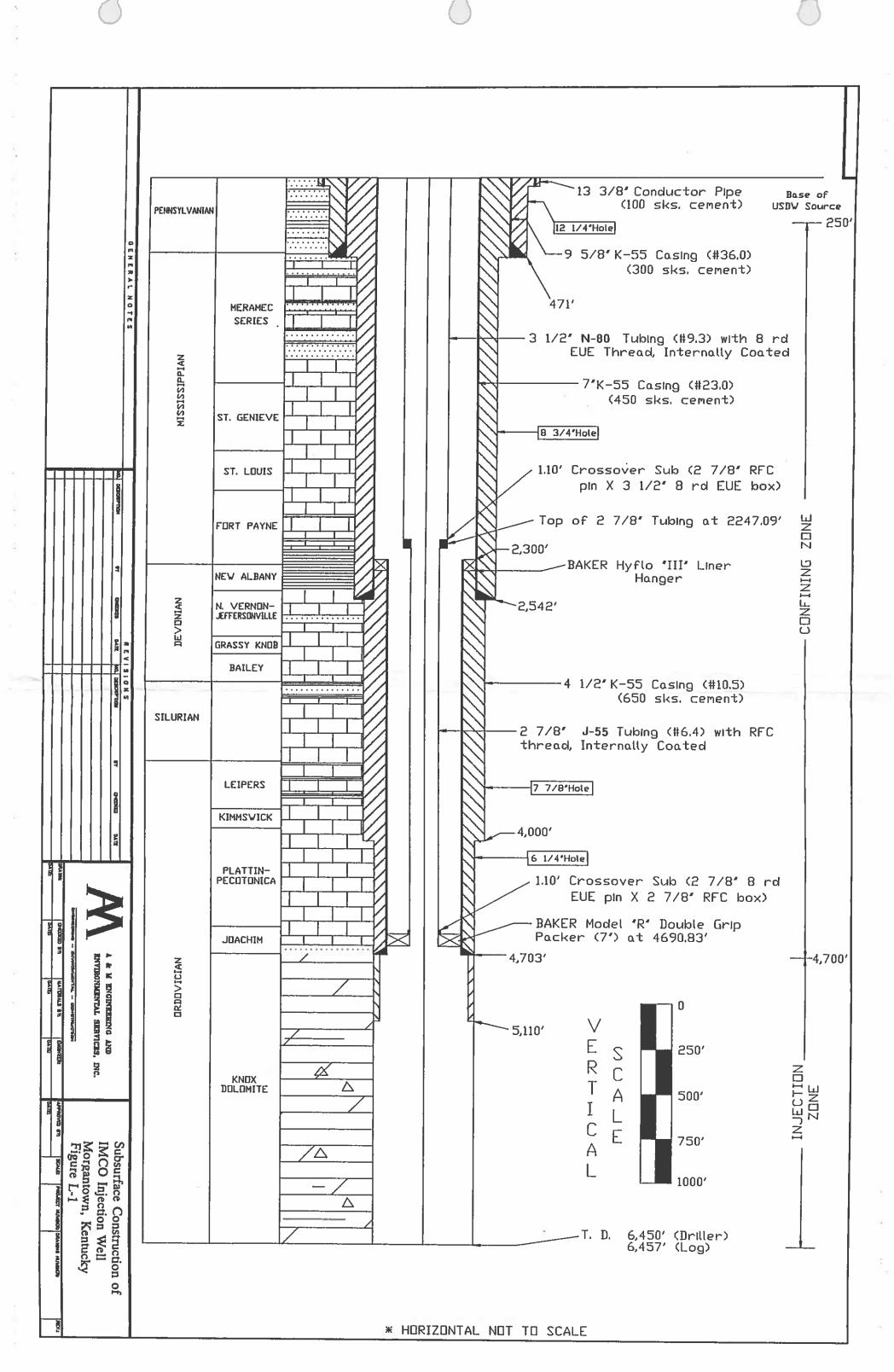
A. & M. ENGINEERING AND ENVIRONMENTAL SERVICES, INC. TULSA, OKLAHOMA

SCHEMATIC SURFACE DESIGN DRAWING OF THE IMCO INJECTION WELL

FIGURE NO. K-I



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CONSTRUCTION PROCEDURES ATTACHMENT L

Company was used. by a rotary drilling rig. During drilling, water-base mud provided by M-I Drilling Fluids The IMCO injection well was drilled during August-December 1991, to a depth of 6,450 feet

Drilling commenced on August 11, 1991. First a 17 1/2" hole was drilled to 42 feet depth and set up 13 3/8" conductor pipe with 100 sacks of cement.

Drilling was continued with 12 1/4" diameter bit to 471 feet (driller depth). resistivity) was conducted before setting 9 5/8" casing at depth of 471 feet. Logging (SP and

The well was drilled with 8 3/4" diameter bit to 2526 (driller depth) feet depth and 7 7/8" bit to 4,000 feet depth. After logging, 7" K-55 long string casing was set in at 2542 feet depth. was made to drill deeper into the Knox Dolomite. The Devonian-Silurian and part of the Ordovician carbonate sections were evaluated for injection and due to low potential and some problems with the fracturing program, the decision

and Gas Division. The well was bottomed to 6450 (driller depth) feet into the Knox Dolomite. Drilling was resumed after new permits were obtained from the U.S. EPA and Kentucky Oil The size of the bit was 6 1/8".

Figure L-1 shows the subsurface construction details of the IMCO injection well. The copies of the drilling records of the IMCO injection well are included in Appendix G and

Casing and Tubing Program:

Conductor Pipe: 13 3/8" conductor pipe was set at 42 feet depth with 100 sacks of

9 5/8" OD, K-55 seamless, 36.0 lb/ft STC (Short Threaded

Surface Casing:

cement.

Collapse Resistance: 2020 psi Internal Yield: 3520 psi Couplings).

Body Yield Strength: 564,000 lbs. Joint Strength: 423,000 lbs.

475.70 feet of new 9 5/8" casing was set in the well with 450 sacks of cement. The lowest USDW is at a depth of 260 feet and the surface casing (9 5/8") is set about 200 feet lower.

Long String:

7" OD, K-55 seamless, 23 lb/ft, long threaded couplings.

Collapse Resistance: 3270 psi. Internal Yield Pressure: 4360 psi.

Body Yield Strength: 366,000 lbs.

Joint (Coupling) Strength: 341,000 lbs.

bonding. Long string (7") casing was set at 2542 feet depth with 450 sacks of cement. The cement was circulated through formation packer pack-off shoe. 7 lowest joints of 7" casing were sandblasted for better cement

shown as Exhibit L-1. These casings were electronically The purchase ticket for 9 5/8" surface casing and 7" casing are

Liner String:

inspected before delivery to the site.

4 1/2", K-55 seamless, 10.5 lb/ft, short threaded couplings. Collapse Resistance: 4010 psi

Body Yield Strength: 165,000 lbs. Internal Yield Pressure: 4790 psi

Joint (Coupling) Strength: 146,000 lbs.

Liner Hanger. Top of hanger is at 2300 feet depth. The 4 1/2" casing was set at 4703 feet depth with 650 sacks of cement. The cement was circulated through formation packer pack-off shoe. The 4 1/2" casing was hung with 7 foot long Baker Hyflo "III"

1/2" casing was inspected electronically before delivery to the site. Baker Hyflo "III" Liner Hanger information is presented as Exhibit L-3. The tally sheet of 4 1/2" casing is shown as Exhibit L-2. The 4

Tubing (Injection):

Two types of injection tubing form the injection tubing string: 1) 3 1/2" OD N-80 tubing inside the 7" casing; and 2) 2 7/8" OD Jtubing types are given below. 55 tubing inside the 4 1/2" casing. Specifications of these two

3 1/2" OD N-80 Tubing:

Weight: 9.30 lb/ft

Inside diameter: 2992 inches

Collapse Resistance: 10,530 psi Internal Yield Pressure: 10,160 psi Coating: TK-70 of Tuboscope (plastic coating inside). Joint Yield Strength: 207,220 lbs. Thread type: 8 rd EUE upset Drift diameter: 2867 inches

The 3 1/2" tubing tally is shown as Exhibit L-4. The 3 1/2" tubing is 2,247.09 feet and connected with 1.10 feet long crossover to the 2 7/8" tubing. The crossover sub is with 2 7/8" RFC pin and 3 1/2" 8rd EUE box.

2 7/8" OD J-55 Tubing: Weight: 6.40 lb/ft Coating: TK-77 of Tuboscope (plastic coating inside) Joint Yield Strength: 49,450 lbs. Inside diameter: 2441 inches Drift diameter: 2347 inches The tally is in Exhibit L-4. Internal Yield Pressure: 7700 psi Collapse Resistance: 8100 psi Thread Type: RFC (Reed Flush Coupling)

4690.83 feet depth. The packer is connected to the 2 7/8" tubing by a crossover sub (2 7/8" 8rd EUE pinX 2 7/8" RFC box).

4 1/2" x 2 7/8" Baker Model "R" Double Grip Packer set at

Packer (Injection):

presented in Exhibit L-5. The packer is plastic coated and its technical information is

Cement Program:

Conductor Pipe - 13 3/8" conductor pipe is set at 42 feet depth and cemented with 100 sacks of Class A cement and 2 sacks of Calcium Chloride. The cement was circulated to the surface. The cement job ticket is included in Exhibit L-6.

Surface Casing - 9 5/8" K-55 casing is set from 471 feet depth to the surface and cemented with 300 sacks of Class A cement and 4 sacks of Calcium Chloride. Three

centralizers were used. The cement was circulated to the surface. The cement job ticket and report of the U.S. EPA representative are included in Exhibit L-6. Cement Bond Log for this casing was run and is included in Appendix D.

Long String - 7" K-55 casing is set from 2542 feet depth to the surface and cemented with 450 sacks of Class A cement, 2% gypsum, 3% potassium chloride and other additives. Three cement baskets and fifteen centralizers were used. The cement was circulated to the surface. The cement job report and report of the U.S. EPA representative are included in Exhibit L-6. Cement Bond Log for this casing was run and is included in Appendix D.

Liner (4 1/2" Casing) - 4 1/2" K-55 casing is set at a depth of 2300 - 4703 feet. The overlap in between 7" and 4 1/2" casings is 242 feet. The liner hanger is seven feet long, Baker Hyflo "III" type. Twenty-two centralizers were used. The liner was cemented with 650 sacks of Class A cement, 2% gypsum, 3% potassium chloride and with additional additives. The cement was circulated to the surface. The cement job report and report of U.S. EPA representative are included in Exhibit L-6. The Cement Bond Log is included in Appendix D.

Logging Program:

The following logs were run in the IMCO injection well during construction:

- 1) After drilling to 471 feet depth
 - a) SP Induction Electric Log
- 2) After drilling to 4000 feet depth
 - a) Gamma Ray Compensated Neutron -Litho Density
 - b) Gamma Ray Dual Induction SP Caliper
 - c) Digital Sonic Gamma Ray
 - d) Formation Tester
 - e) Cement Bond Log for Surface Casing and Long String
 - f) Cement Evaluation Log for Long String
- 3) After drilling to 6450 feet depth
 - a) Gamma Ray SP Dual Induction Caliper
 - b) Gamma Ray Neutron Density
 - c) Temperature Log
 - d) Cement Bond Log
- 4) After cleaning the well and swabbing
 - a) Temperature Log

b) Injection Tracer Log.

Copies of all the above logs are included in Appendix D.

Well Integrity Test:

All the casings (9 5/8", 7" and 4 1/2") used in the construction of the well were purchased new and had been manufactured to API standards. Also, all purchased casings and tubings were inspected by Tuboscope Company for any potential defects.

Cement jobs for each casing string were inspected by running Cement Bond Logs and a Cement Evaluation Log. Copies of these logs are included in Appendix D and they show fair to good bonding.

The tubing and packer were installed in the well on February 5, 1992 and the annulus was filled with water containing corrosion inhibitor (Halliburton Anhib). The packer and wellhead were pressure tested to 1000 psi and it was holding. The chart and job reports are shown in Exhibit L-7.

After completing surface facilities and testing of the well, another mechanical integrity test (MIT) was conducted in the presence of the U.S. EPA representative on October 9, 1992. The well annulus was pressurized to 309 psig and observed for half an hour and the IMCO injection well passed the MIT. The report of this test is included in Exhibit L-7.

Since 1992, during operation, no failures have been encountered in the well. Another MIT was conducted on October 28, 1997 in the presence of a U.S. EPA Region IV representative and the MIT was successful. The report of this test is included in Exhibit L-7.

EXHIBIT L-1

SURFACE (9 5/8") AND LONG STRING (7") CASING PURCHASE TICKETS

INVOICE NO. Nº

READD SUPPLY, INC.

26206 OAK RIDGE DRIVE SPRING, TEXAS 77380

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(713) 367-6046

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Readd Supply, Inc.

P. O. Box 2358-

INVOICE DATE: 08/20.

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Spring, Jexas 77383-2358

IMCO

C/O HYW 70 & GARDNER LANE

MORGANTOWN

KY 42261

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NOTE: Discount in the amount of \$632,29 allowed if payment is received by

-08/30/91--- ·

TOTAL INVOICE:

\$31,6

Release No. RS#4876

NO CREDIT ALLOWED ON GOODS RETURNED WITHOUT PERMISSION. DUE AND PAYABLE IN MONTOOMERY COUNTY TO READD SUPPLY, INC. THERE WILL BE A SERVICE CHARGE O PER MONTH ON ACCOUNTS AFTER 30

Subject to Section 7 of Conditions of applicable bill of Inding, if this adjuperation to be delivered to the consignes without recourse on the consignes, the consignor shall sign the following statement.

The certier shall not make delivery of this shipment without payment of freship and all other lawful charges. (Shipper's imprint in lieu of stamp; not a part of Hill of Lading approved by the Interstate Commerce Commission. **W** If charges are to be prepaid, write or etamp here; "To be Prepaid." Received & to applyment of the charges on the property described hereon. Per (The signature here acknowledges only the amount prepaid.) (Mail or street address at consignes—for purposes of notification only | Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said strms and conditions are husby egreed to by the shipper and eccepted for himself and his suigns. Application of the supplimination of the proportional application of the supplimination County Address A Agreed to the filled in only when shipper desires and governing tariffs provide for delivery thereof? (Signature of Consignor) Agent or Cashier Shipper's No. (1.1.1.) Address * L Carrier's No. Agent, Per ニーラク Check Delivery Is an acknowledgment that a Bill of Leding has been issued and is not the Original Bill of Leding, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record. The fibre boars used for this shipment conform to the specifications set farth in the boar maker's certificate thereon, and all other requirements of the Consolidated Freight Classification. Class or Rate WEET. NOTE—Where the cate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the ablaper to be not exceeding If the chipment moves between two parts by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's Car or Vehicle Initials From /Y . RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of the Bill of Lading. 8 1200 一. () 上一 一 .1.57.4 1 1. 61 : State 1 Zip. Shipper, Per Burger I it wil Kind of Pachage, Description of Articles, Special Marks, and Exceptions (Name of Carrier) 12 / Com 36. Permanent post-office address of shipper, This Memorandum Delivering Carrier_ Consigned to_ No. Packages

WilsonJones

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Permanent post-office address of shipper.	75.	9

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DA READON CARRIERS, INC. BUCKBOARD Consignee RATE WT/MILES WHITE COPY -- DELIVERY 8401 PRO NO. ICC REGULATIONS REQUIRE PAYMENT OF THIS BILL IN 7 DAYS. 7. 234 KS & R3CX. DESCRIPTION This is your ORIGINAL INVOICE (non-negotiable) HOUSTUN TEXAS FTS 31340 1326.40 UM ERICANY DIDE 3812. ONTES RD. SHIPPER NO. 9/65 70 Tractor No. 104 Shipper

EXHIBIT L-2

LINER CASING (4 1/2") TALLY AND PURCHASE TICKETS

BOSCOPE INC.

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READD SUPPLY, INC. 25205 OAK RIDGE DRIVE SPRING, TEXAS 77380 (713) 367-6046

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5285,83 NOTE: Discount in the amount of_ allowed if payment is received by 12/05/91

TOTAL INVOICE:

\$14,291

Releaso No. RS#5108

NO CREDIT ALLOWED ON GOODS RETURNED WITHOUT PERMISSION. DUE AND PAYABLE IN MONTGOMERY COUNTY TO READD SUPPLY, INC. THERE WILL BE A SERVICE CHARGE OF 1 PER MONTH ON ACCOUNTS AFTER 30 DA'

EXHIBIT L-3

LINER HANGER AND HANGER JOB DATA



Normal Job

LINER TOOL REPORT

For Eng. Use Only:

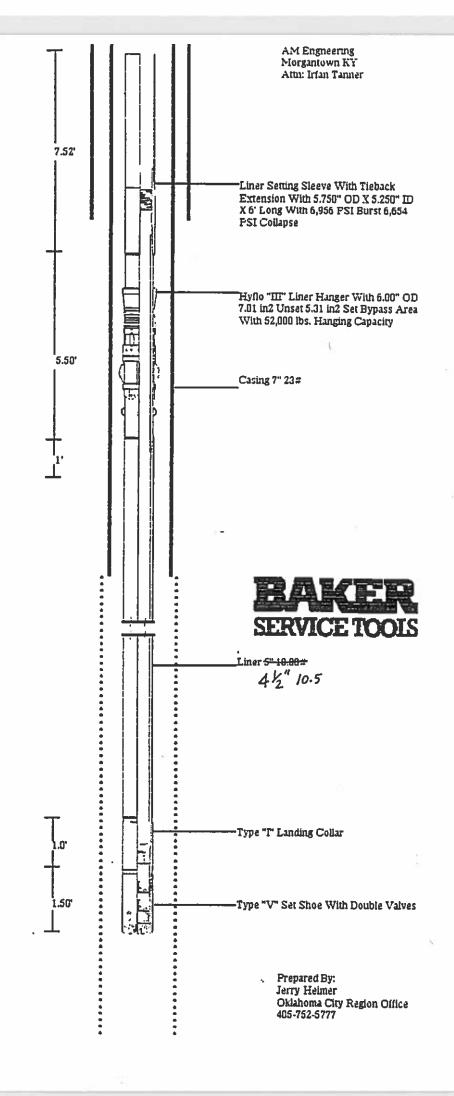
BST-20-36

FORM DISTRIBUTION

- (1) WHITE-DISTRICT FILE
- (2) YELLOW-QA HOUSTON

(3) PINK-REG'N. MGR.

Unsatisfactory Job 1 2 3 4	56789_	0				
TMCO Recycling Two		,	7/7-	7/5/7/	717-71-	
Customer IMCO Recycling INC. Da	T	SS	1#	16876	717-768	7.7
Field/Block Le	ease IMCD IN	PC1701 We				
Dist. Mgr BS	ST District DK19, CI+4	1014, Joi	b Log No			
1. WELL INFORMATION: Cased Hole Depth						_
Deviation Hole Problems (lost circulation, tight spot, etc.):	101.4 0 Ullag'	_True Vertical D	epih <u>67</u>	20		
Csg. size Weight Size Weight Size Weight Size Size Size Weight Size	WAL IN TALL	K.55			117	—
Csg. size/ weight	Grade	72-33	Sho	e@ <u>~~</u> 3	72	—
2. LINER INFORMATION: Size 4 1/2 v Length 2399.38 Top 2318.62 Ove	Weight <u>/ 0 . 5</u> ortap <u>223 · 38′</u> Pick	Grade <u>K-5</u> -up Wt. <u>40</u>	<u>5</u>	Threads	8RD ST 32	≢ C
3. DRILL PIPE: Size 27/8 Weight 7.9	Grade <u>ル-</u> を	top		,		
SizeWeight	Grade	btm Ru				
Tool Description	Commodity No.	9/18 0.0.			N PROPER	1
Formation Pkr. Pack-off Shoe	Commodity (40,		1.D.	Length		Y/I
1 St. 41/2"10,5# K-55		41/2			4715.58	
LANDING COLLUT		5		_	4679.31	
54 Sts. 442 10.5# K-55		41/2			2324.75	$\overline{}$
X-over Bshq.		59/16	4.052		2324.00	$\overline{}$
YFIO ILHANGER		5	4.276		2319.71	
R.H. Skeve		53/4	4.276		2318.62	$\overline{}$
			111	,,,,		
						\vdash
						Г
4. SETTING RESULTS:						
collar (if applicable). Did hanger s Press. to Rel. Hyd. Setting Tool Right-hai	nd set, or left-ha	and set	? Round	s to set har	nger <u>2</u>	
Picked upto c						
5. CONDITIONING: Mud circulated after liner on botto						—
Maximum pressure 350 circulated 6. CEMENT JOB: Weight on setting tool while cemen	before () or after ()	hanger was	; se
						—
Calculated pumping time	Percent of excess	35	% Start mi	xing @O	250	
Finish displacing plug at Ma						
7. PLUG DISPLACEMENTS: Pumpdown plug bumpe						
Pressure from 710 to 790					<u> </u>	—
Calculated displacement 49.7	Pressure plugs bumped at	1300 10	d roo	,•		
8. FOLLOW-UP ACTION REQ'D: Yes No						
9. COMMENTS:						
Johnny C Kandelo			ch.			
Baker Beb. Signature		Custome	er Rep. Sign	nature		





JOB LOG

FORMCO NO. BST-20-39

No. 042206

Page _____ of ___

	Inco F	Recycling Inc. Represented by: IRFAN TANER Lease: TMCO TNIECTION Field: State: Ky. 76 717-76877 Date: 1-27-91' Service Rep.: Jinny (Ragsdule)				
Operating Company:		Lease: TMCD TNIECTION Field: State: Ky.				
Well Name or Numbe	フノフ・フノ スフ	76 717-71877 Date: 1/-27-91' Service Rep. Johnny C. Randule				
BASE POINT OR DIS	TRICT LOCATION	ON: Oklahuma City, Okla.				
DETAIL THE JOB -	THIS FORM U	SED TO REPORT WHAT ACTUALLY TOOK PLACE - FILL OUT COMPLETELY				
Date & Ti	ime	Operations & Remarks				
11-25-91'	0700	ON LOCATION WAITING ON RIG CIEW				
	0930	L'rew Arrived				
		R.U. Picked up 2300' 27/8 The Tripped in hole to 515				
	1830	Circ. 2 hrs. & T.O.O.H.				
	1.0	S.D. F.N.				
11-26-91	0700	R. 4. F Run 55_1ts. 41/2" 10.5# K-55 .				
		PANS Formation Pkr. Shoe - 1 St. 442" 18.5# K-55 - LANDING COLLER-				
		54 Sts. 41/2" 10.5" K-55 - X-over Bshq - Hyflo TIL HANGER - Std. R.H				
		Tetal = 2399.36'				
<u> </u>	2145	Hit Tight Spot @ 4429' Worked Pipe - Pall 2 stds- Trip				
		BACKIN FINALLY GOT THE				
11-27-91'	0045	Got of of Lines Dropped BALL P. U. Davel				
	6200	Got of times Ovapped DALL 1.4. Varel				
	0400					
	0545	Displace Lement out of 1100				
		T. O. O. H.				
		T.O. L. @ 2318.62 P.B. T.D. @ 4679 Averlap 223				
		Set 0 4718'				
	·	30 (0 7110				
		71				
Customer Rep. Sign	ature:	Trans				
(d.		7				
Customer Comment	e.					
Odstomer Comment						
1						

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9	EI
3	WIC
	S

11-25-91

SO-10

PURCHASE ORDER NUMBER

QUANTITY

4

42 bo g 1394 00 00 066 DATE SHIPPED 1/ 1/25 19/ 457 DC 398 DO 77-76877 42 OH 1SS | 2 Imco INION CUSTOMER CODE | PROJECT CODE | SMIP 91A DE/1 VET 1 101 10 697 万 FOHM BST 20 60 (HEV AND) P.O. BOX 200415 HOUSTON, TEXAS 77216 PRODUCT NO. FIPARTS TERMS: NET 30 DAYS FROM DATE OF INVOICE SALES & SERVICE INVOICE Lich W Swal- Cupa (31373 ERRITORY WELL NO -0 $S = - \Delta$ (wate lumber) DESCRIPTION COUNTY TO REMIT TO: BAKER SERVICE TOOL RFUESPO BOX SULTUR CHICAGO 3/2 DRODDING AFELD wa Mecycling INC Donues a Book Pluge SHUPPED FROM HOISTRICH, J. J. J. J. J. 5"ARH F.D. Bay 1010 REQUISITION NUMBER M) or gantown COMMODITY NO. P.O. BOX 40129, HOUSTON, TEXAS 77240 A Baker Hughes company

(CHARGES ARE SUBJECT TO CORRECTION BY OUR INVOICING DEPARTMENT IN ACCORDANCE WITH LATES INVOICING DEPARTMENT IN ACCORDANCE WITH LATES PRICE SCHEDULES AND THE ADDITION OF APPLICABLE

TOTAL

CHECKED CODED

-TAX ()

I cartify that the above materials or services have been received on the terms and conditions sat forth on the reverse side has only which the undersigned has read and underslood, that the basis for charges is correctly stated and that I am authorized to sign this memorandum as agent of owner or contractor.

AGENT OF OWNER OR CONTRACTOR:

SIGNED FOR BAKER SERVICE TOOLS

00 H

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ot

δ

EXHIBIT L-4

TUBING (3 1/2" AND 2 7/8") TALLY, PURCHASE TICKETS AND TECHNICAL DATA FOR 2 7/8" TUBING

OFFICE: 5432 E. 5th Place TULSA, OKLA. 74112

H. CHAPMAN Phone 836-5810, Tulsa, Okla. 74112

CHAPMAN

OIL & GAS WELL SALVAGING CO. HYDRAULIC CASING PULLING CONTRACTORS

TULSA, OKLA.

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									714	90

Ur JE: 5432 E. 5th Place TULSA, OKLA, 74112

H. CHAPMAN Phone 836-5810, Tulsa, Okla. 74112

CHAPMAN

DIL & GAS WELL SALVAGING CO. HYDRAULIC CASING PULLING CONTRACTORS

TULSA, OKLA.

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Inc.

(214) 775-5476

Readd Supply 26206 Oakridge Drive spring, TX 77380

IMCO E3#5141 INV 16516

TB9377

01-02-92

Readd Supply c/o IMCO Morgantown, KY

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RFC™

ali yang ang penggapangan salah salah dari kebangan kelalah salah salah salah salah salah salah salah salah sa Manggapan salah
Flush OD liner connector

30° torque shoulder and metal sessi

This external torque shoulder ensures the pin and box are exactly positioned. Most of the makeup torque is applied to this shoulder, which generates a metal seal for collapse pressure rated to the API minimum collapse rating for the pipe. This seal also serves as a backup to the pin nose seal.

Two-step thread design

This nonjupered, noninterference thread form minimizes gailing and thread-generated stresses.

Center-step torque shoulder

This shoulder performs as an additional torque shoulder, storing a small amount of torque and helping to prevent overmakeup.

14° metal seat

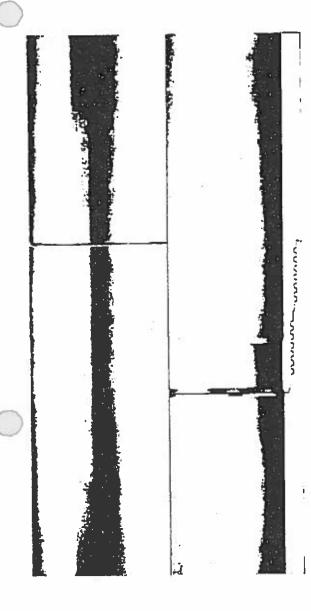
This pin nose seal is created by radial interference and is rated to the API by drustatic test pressure for the pipe.

Formed pin member

The pin end is swaged inward and then machine bored to ensure proper pin nose seal geometry without restricting driftability. This forming is done at ambient temperature, prior to threading, and is stress relies ed.

Interchangeability

The RFC design is interchangeable with the Hydril FJ *connector, except for those weights indicated in the adjacent tables.









RFC

	. F	lpe	data	3			Cor	nec'	tor o	lata			C	onr	ect	or s	tren	-		а	
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	11,50	11.35	0.250	4 900	1473 1103	3.610		1 734 1910,1		0.97	4 27 4	179	8,150	178	3,150	163	5,580 6,050	290	1 443 1,880	236	10,720
	本12,50 申13,50	12 24 13.74	0.290		1795	2.340		1,531		3 17	4 15 1	171	7,650	179	7,550	168	-•-				10.75
ļ	15.50	14.98	0.33		3,701	3.74				1.32		220	8,170 6,544		8,170 6,540	231	8,500 5,800		7,460 7,580		3,61
1	18 30	13.69		1 1840	3315	3.564	2.78			104	• • • • •	1			7.A20		8,233	742	9,050	275	13.28
5	ak15.00	14.87	0.29	4,408	4.283	4 32	1 2.33	2.20	4 50 4	1 16	0 25,1	209	7,825	• •	•				9,560		10.44
	18.00	17 13			4,151	4 19		2 80 2.60		1.47		256 256	8,254 7,40	2 264	3.250 7,460	280	6,590 7,790	338	0,580	350	9,73
	20.50				4 059 4.031			1.80	8 45.2	1.47	9 246	254	7,17	264	2 170 8,410		7,530 8,750		8,310 7,420		£44
	23.20	23.03	0.42	4.044	3.313	1 196		210		1.47			6,41 5,16	254	6,160		1,440		7,:30		\$,10
	24 10									1,30	1 29.2	211	1.55		7,560	223	4,07		8.820	278	10,02
5-1/2	15,50 \$17,00				4,825 4,763						25.6		7,34	G 739	7,344	252	2.10	277	9,130		
					4 843	1 4.65	8 14	2,11	3 53.4			215	4,29	295	8.290		5,73/ 7,67		9.500 9.440		10,91
	20 00 23 00 28 00	22.54	0.41	5 4 570	4,54	4,59	0 14	1.11	3 470				7,29 6,43	0 295 0 294	7,284 8,433		1.17		7,440		1,4



I. RFC CONNECTOR PRESSURE RATINGS

COLLAPSE — pressure rated to the API Collapse pressure rating for the pipe body.

INTERNAL — pressure rated to 91.4% of the API Minimum Internal pressure rating for the pipe body.

HYDROSTATIC TEST — pressure rated to 37.5% of the API Hydrostatic pressure rating for the pipe body.

2. RFC designs grouped together by weights, as shown above, are interchangeable with each other.

3. All of the RFC designs displayed above are weaker in tension than the pipe body. The minimum parting loads displayed were calculated by multiplying the connector tension cross-sectional area by the minimum ultimate Hensile! strength for the considered grade of pipe. To calculate this rating for a grade of pipe not displayed, determine the grade's minimum ultimate strength rating and multiply it by the connector tension cross-sectional area. The value assigned as the minimum ultimate strength rating for the high-collapse -95 grade shown above was 110,000 psi, although this value may be mill vary by mill.

4. The setting depth values displayed above were calculated by dividing the connector's minimum parting load rating by the plain end pipe weight in air and the factor of safety displayed. To determine the factor of safety for a particular string length, use the following equation:

| Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | Connector Minimum Load Rating | C

Facior of Safety (FOS) - Connector stranger Weight in Air

These values do not consider buoyancy or any other downhole effect and are displayed for reference only.

5. The compressive cross-sectional areas listed above can be used to calculate the elastic (yield) compressive strength of the RFC connector using the following equation:

Elastic compressive strength = compressive cross-sectional area x minimum yield strength of the considered grade. following equation:

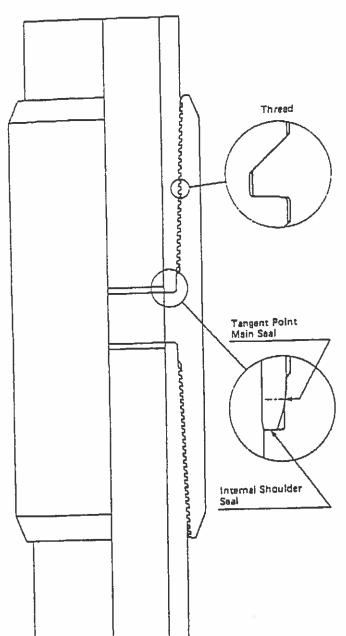
6. Material geometry for accessories is available upon request by calling the Houston facility at 713-230-6350.

a. This is nominal pipe ID and is used as pin ID for accessory blanking purposes.

* Interchangeable with Hydril's FI flush OD connector.



DESIGN PRINCIPLE OF NK 3SB TUBING



- Threaded and Coupled Connection Applied to Non-upset Pipe
- 2. Two Metal to Metal Seals
 Sliding Type Seal with Tangent Point
 Contact and Internal Shoulder
- 3. Positive Torque Stop in Internal Shoulder
- 4. Internal Flush Smooth Bore
- 5. Flat Crested Thread Parallel to Pipe Axis 8 Threads per Inch
- 6. Load Flank Zero degree
 Stabbing Flank 45 degrees
- 7. Tapered and Runout Type Thread Taper 1/16
- 8. Precision Machining



RECOMMENDED MAKE-UP TORQUE

NK3SB TUBING (Regular Coupling)

(ft-lbs)

				Grad	ie	
Size O.D. (in)	Nominal Weight (lb/ft)	Wall Thickness (in)	J55	C75 N80 L80 AC80	AC90 AC95 C95	P105 NK125
	* 4.70	0.190	1,200	1,200	1,300	1,400
2-3/8	* 5.30	0.218	1,400	1,500	1,500	1,600
	-	0.254	1,600	1,800	1,900	1.900
	5.95	0.261	1,700	1,800	1,900	1,900
	7.70	0.336	2,000	2,200	2,300	2,400
2-7/8	• 6.50	0.217	1,800	2,000	2,100	2,200
2-110	7.90	0.276	2,100	2,300	2,400	2,500
	8.70	0.308	2,300	2,600	2.700	2,800
	9,50	0.340	2,500	2,800	3,000	3,100
	10.70	0.392	2,800	3,300	3,500	3,700
	11.00	0.405	2,800	3,300	3,500	3,700
	11.65	0.440	2,800	3,300	3,500	3,700
3-1/2	9,30	0.254	2,700	2,900	3,100	3,300
3-114	10.30	0.289	3,100	3,400	3.600	3,800
	12.80	0.368	3,900	4,400	4,600	4,900
	12.95	0.375	3,900	4,400	4,600	4,900
	15.10	0.449	4,500	5,000	5,300	5,700
	15.80	0,476	4,500	5,000	5,300	5,700
	16.70	0.510	4,600	5,200	5,500	5,900
	17.05	0.530	4,600	5,200	5,500	5,900
4	11.00	0.262	3,600	4,000	4,100	4,300
•	13.40	0.330	4,400	5,000	5,200	5,400
	19.00	0.500	6,000	6,700	7,000	7,500
	22.50	0.610	6,400	7.000	7,300	7,800
.(2	* 12.75	0.271	3,500	3,900	4,100	4,300
. –	13.50	0.290	4,200	4,700	4,900	5,200
	15.50	0.337	5,000	5,500	5,800	6,300
	19.20	0.430	6,000	7,000	7,500	8.000
	21.60	0.500	6,200	7,500	8,000	8,500
	24,00	0.560	6,500	7,700	8,500	8,700
	26.50	0,630	6,500	7,700	8,500	8,700

vith *

reque values are 110% of optimum torque, que values are 90% of optimum torque.

values are 120% of optimum torque.

lues are 80% of optimum torque.

\(= 0.90 \times \text{Regular}



DIMENSION & PROPERTIES OF NK 3SB TUBING

			Coupling (in)				Pipe		
Pipe Section (Nomina	Pin Length		D.	0.	Drift	I.D.	Wall		
	44.5	Length	Special	Regular	Diameter	(Nominal)	Thickness	Nominal Weight	O.D.
(Sq. in	(in)	(in)	Special	Regular	(in)	(in)	(in)	(lb/ft)	(in)
1.30			2.700	(,	1.901	1.995	0.190	4.70	2-3/8
1.47		1	2.700		1.845	1.939	0.218	5.30	2-310
1.69	3.743	8.472	2.732	2,875	1.773	1.867	0.254	5.95	
1.73			2.744		1.758	1.852	0.261	6.20	
2.15			-		1.608	1.702	0.336	7.70	
1.81		i i	3.220		2,347	2.441	0.217	6.50	2-7/8
2.25		ii.	3.280		2,229	2,323	0.276	7.90	- 110
2.48			3.323		2,165	2.259	0.308	8.70	
2.70	3.743	8.472	3,366	3.500	2.100	2,194	0.340	9.50	
3.05			- !		1.996	2.090	0.392	10.70	
3.14			- 1		1.970	2.064	0.405	11.00	
3.36			-		1.901	1.995	0.440	11.65	
2.59			3.982		2.867	2.992	0.254	9.30	3-1/2
2.91			3.933		2.797	2.922	0.289	10.30	
3.62		l i	4.051		2.639	2.764	0.368	12.80	
3.68	3.775	0.000	4.059		2.625	2.750	0.375	12.95	
4.30	3.713	8.535	_	4.250	2.477	2.602	0.449	15.10	
4.52			-		2.423	2.548	0.476	15.30	
4.79			_		2.355	2.480	0.510	16.70	
4.94			-		2.315	2.440	0.530	17.05	
3.07			4.402		3.351	3.476	0.262	11.00	4
3.80	4.056	9.118	4.492	4.750	3.215	3.340	0.330	13.40	•
5.49			-	7.130	2.875	3.000	0.500	19.00	
6.49			-		2.655	2.780	0.610	22.50	
3.60		222	4.921		3.833	3.958	0.271	12.75	4-1/2
3.83	233	E/0.7.1	4.921		3.795	3.920	0.290	13.50	*
4.40	4 Ans	9 498	4.996	\$ 700	3.701	3.826	0.337	15.50	
5.49	=7	1000	1 /2/2	5.200	3.515	3.640	0.430	19.20	
6.28	2	EUE	0		3.375	3.500	0.500	21.60	
6.93)FF = =================================	WAYCHO	Б- н.		3.255	3.380	0.560	24.00	
7.60	1.7	WAYCHE (SEVE)	1		3.115	3.240	0.630	26.50	
	. /	2	6,				<u> </u>		



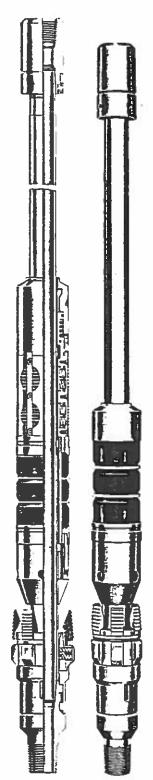
				-1							The state of	9	Jack.
	(B)					J.	aint Yiel	d Strengt	th (1,00	10 lbs)			
Cri	pling lical (Sq. in)	Efficie	pling ncy (%) x 100	J55	C75	N80 L80 AC80 CR9,13,25 -80 NIC25,32 -80	C90 AC90	C95 AC95 CR9,13	P105	NIC 25 32 42 -110 CR22 -110	NK125 NIC 25 32 42 42M 52 -125 CR22	NIC 42M -135	NIC \$2 -140 CR22 -140
2.365	1.603 1.603 1.740 1.791	131 160 140 136	123 109 103 103	72 81 93 95 119	98 111 127 130 162	104 118 135 139 172	117 133 152 156 194	124 140 161 165 204	137 155 178 182 226	143 162 186 191 237	163 185 212 217 269	176 199 228 234 291	183 207 237 243 301
3.503	2.025 2.332 2.555 2.781	193 155 141 129 114 111 104	112 103 103 103 - -	100 124 137 149 168 173 185	136 169 186 203 230 236 252	145 130 199 217 245 252 269	163 203 224 244 275 283 303	172 214 236 257 291 299 320	190 237 261 285 321 330 353	199 248 273 298 336 346 370	227 282 311 339 382 393 421	245 304 335 366 413 424 454	254 316 348 379 428 440 471
5.045	2.682 2.995 3.735 3.786 — —	195 173 139 137 117 112 105 102	104 103 103 103 - - -	142 160 199 203 237 249 264 272	194 219 272 276 323 339 359 371	207 233 290 295 344 362 383 396	233 262 326 331 387 407 431 445	246 277 344 350 409 430 455 470	272 306 380 387 452 475 503 519	285 321 398 405 473 497 527 544	324 364 453 460 538 565 599 618	350 394 489 497 581 610 647 668	363 408 507 515 603 633 671 692
5.808	3.292 3.920 	189 153 106 89	107 103 - -	169 209 302 319C	231 285 412 436C	246 304 440 465C	277 342 495 523C	292 361 522 552C	323 400 577 610C	338 419 605 639C	385 476 687 726C	415 514 742 784C	431 533 770 813C
6.171	3.954 4.529 - - -	171 161 140 112 98 89 81	110 103 103 - - -	198 211 242 302 339C 339C 339C	270 288 331 412 463C 463C 463C	288 307 353 440 494C 494C 494C	324 345 397 495 555C 555C	342 364 419 522 586C 586C 586C	378 403 463 577 648C 648C 648C	396 422 485 605 679C 679C 679C	450 480 551 687 771C 771C 771C	486 518 595 742 833C 833C 833C	504 537 617 770 864C 864C 864C

Note: C Critical Member is Coupling Side.

EXHIBIT L-5 INJECTION PACKER DATA



RETRIEVABLE PACKER SYSTEMS



Model "R-3" Double-Grip, (left) and Single-Grip (right) Retrievable Casing Packers

MODEL "R-3"™ DOUBLE-GRIP RETRIEVABLE CASING PACKER Product No. 642-01

The "R-3 Double-Grip" is a truly versatile set-down type packer. Proven by its worldwide use, it performs reliably in production, stimulation and testing operations.

FEATURES/BENEFITS

- Hydraulic button-type hold down located below the bypass value.
- Unique, built-in, "differential lock" helps keep the bypass valve closed.
- Effective bypass design speeds equalization and resists swab-off.
- Field-proven, three-element packing system and rocker-type slips.

MODEL "R-3" SINGLE-GRIP RETRIEVABLE CASING PACKER **Product No. 641-01**

In wells where excessive bottom-hole pressure is not expected, the "Single-Grip R-3" is the answer to your needs for a set-down. retrievable packer. From the packing elements down, the "R-3 Single-Grip" is identical to the Double-Grip Model. Running, setting and releasing procedures are the same for both packers.

TO SET THE PACKER: The "R-3" is set by picking up, rotating to the right and then slacking off on the tubing. Set-down weight closes and seals the bypass valve, sets the slips and packs-off the packing elements.

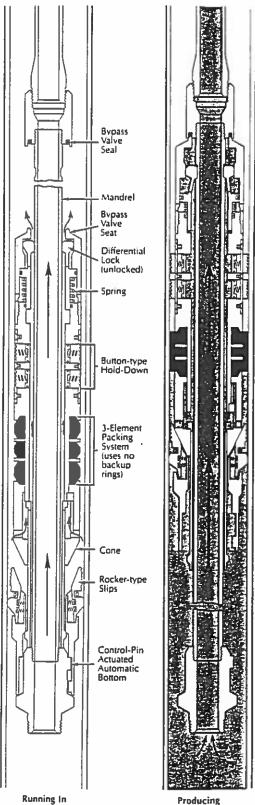
TO RELEASE THE PACKER: Picking up the tubing releases the packer (no rotation required). When the tubing is raised, the bypass valve opens to permit circulation through and around the packer.

When the tubing string is raised the full length of the packer, the J-pins (on the bottom sub) are oriented for automatic reengagement. By then lowering the tubing slightly, the J-pin engages the J-slot thus assuring complete release and preventing accidental resetting while retrieving the packer.

ORDERING EXAMPLE:

PRODUCT NO. 642-01 SIZE: 4784 (7" OD 20-26 lb/ft casing)
MODEL "R-3" DOUBLE-GRIP RETRIEVABLE CASING PACKER w/2-7/8" OD EU 8 RD Box x Pin, for J-55, 6.5 lb/it tubing

MODEL "R-3" DOUBLE-GRIP PACKER OPERATION



Producing



2-7/8 00 EU 8 RD 73.02

3-1/2 OD EU & RD 84.90 2-7/8 00 EU 8 RD 73.62 3-1/2 00 EU & RD 88,90

16,581

6.672

4702

4702 ± 3

6.453

2.41 61.21 3.00 76.28

47C4

47C4 x 3

2-7/8 OD EU 8 RD 73,02

3-1/2 00 EU 8 RD 88.90

173,82

47D4 x 3

49A2 4944 4982 5142 **5144** 5182

6.112

47D4

3-1/2 OD EU 8 RD 88,50

7,781

8.218 208.74 8.437 214,39

3 96

7.531

3.00

2-7/4 00 EU 0 RD 73,02

2.41 61.21 3.00 76.29

4702

47C2 x 3

3-1/2 OD EU 8 RO

3-1/2 00 EU 8 RD 68,90

154,38

6.078

2.41 61,21 3.00 76,20

4784



SPECIFICATION GUIDE MODEL "R-3" DOUBLE-GRIP AND SINGLE-GRIP RETRIEVABLE CASING PACKER PROD. NOS. 642-01, 641-01 Thread Specification #3 Box Up & Pin Down

₽₽

Sizett

2-3/8 OD EU 8 RD 68.33

1.96

ISEF

三世

2-7/8 OD EU 8 RD 73, 62

5.656

2.41

5 588

46A.4 47.42 47A4 3-1/2 OD EU # RD

5.812 5.961

3.60

47A4 x 3

2-7/8 OD EU 8 RD

5 656 143,66 5.781 146,64

2.41

46B 4774

16.14 47.42 73,02

8	Weight		10 Range in Which Pather May Be Run		E P	Gage & Guide	Thread Specification #2	8	Welshim	to Ran Packer	to Range in Which Packer May Be Bun
		W W	Ман	Stra ¹¹²	:	Riag OD			•	Min	E 22
In.	11 Mil	to.	la. mm		in.	in and	ta. mm	al and	116/11	al and	la.
2		2.347	2,441	28A		56,74				5.791	5.921
2-7/8	6.4—6.5	59,62	62.00	20A ⁽⁰⁾ HI-Temp	75	2,330 59,74	1,315 OD EU 10 RD 33,40		24—28	1771	150,4
	4.7—5.6	2.442 62,03	2.563	288		2.357			24	5,838	5.937 150.8
	10.2	2834	2.922	35A		2,742		6.5/1	17—28	5.938	155,8
3-1/2	7.7-9.2	2,923	3.068 77,93	358	1.38	72,24	1,900 00 UE 10 RD 48,26	-	20	5 949	154.8
	2,75	3.069	3,184	350		3.034			1	6,135	6.276
101,60	9.5-11.6	3.428	3.548 90.12	¥	1.50	3,303			2	197.5	5 921
4-12	15.1	3.754	3.826	418	35,10	3.620				5.830	5.937
114,30	8.5—13.5	3.910	4.090	434		3.771		·		5.922	6.135
10	15—18	4.250	4,404	438	1.89	4,125	2-3/8 00 EU 8 RD 60,33		32—35	5.930	155,8
127,00	11.5—15 26	4.408	4.560	130		4.250	G.			5.949	154.8
		4.675	4.777	45A2	1.95	4.500		177,88		6 136	6.278
	20—23	117,5	121,3	45A2 x 2 3/8	2. 25 25. 25	114,38	2-7/8 00 EU B RD 73,62		26—29	155,8	159,4
5-1/2 f39,78	15.520	4,778	4.950	45.44	1.96	4.641	2-3/8 DD EU 8 RD 60,33		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	8 278	6.456
	17—20	4.778	4.092	45A4 x 2-3/8	2.38 60,45	117,84	Z-7/N 00 EU 8 NO 73,02			159.4	0791
	13-15.5	4.950	5.190	458	1.96		2-3/0 OD EU 0 RD 60.33		17.30	6.488	100
		4.893 f24.3	5.044	45B a 2-3/B	2.38 60.45		2-7/h 00 EU B RD 73.02		:	164,0	167.1
5-3/4	5'22	1.950	131.8	458	1.96	4.781	2-3/8 00 EU II RD 60,33		33 7—38	6 570	6.797
146,05		1.893	5.044	45B z 2-3/8	2.38	121,44	2-7/4 GO EU 9 RO 73.02		18 j	1,731	6.765
40	26	4.950	5.190	458	1.95		2-3/6 OD EU 8 RD 60,33	7-5/4	24-28.7	6.74	7 875
152,40		4.893 124.3	5.044 128,1	458 z 2-3/8	2.38		2-7/8 OD EU S R.D 73,02	193,68	ŝ	6.766	178.4
	20—23	5.191	5.390	450		5.062			20-24	7.025	2.1.2
152,40	15—18	5.391	5.560	450	_	5.156				178,4	101,0
	34	5.561	5,609	4562	1.96	5.406	2-3/4 OD EU 0 RD 60,33		87 - 48 100 - 400	7.511	7.687
6-5/0	26-32	5.610	5.791	4564		5,484		1.5/II	33_48	7 640	7 921
		5.600	147.1	4642	2.41	5.475	2-7/4 00 EU 8 RD 73,62		≅ 2	7.922	7.08.1
ten selec	tilng a packer for a veight ranges. Ex	a casing well	phi common to 7" 20 lb/ft. cas	two weight range ing use packer si	s (same 00,	chonsa the pa ider certain ci	i) When selecting a pacter for a casing weight common to two weight ranges (some OD, choose the pacter site shown for the lighter of the selection circumstance the other eacher of the first weight ranges. Example: for 7°20 lb/11 casing us pacter site 4702, Under certain circumstance the other eacher		47—53.5	0.343 211,9	220,5
8 28, 35	o uun, such as wi 2, 41 are avallabl	ben runaling le la Uhis mei	la mirod casir fol as singlo-g	ng sisings. rip packers, Prod.	No. 641-81	. For double-q	stre may be tun, such as when runalng la mited casing stulngs. Stres 28, 32, 41 are available to this medel as single-grip packers, Prod. No. 641-81. For double-grip yearlon, coolst, your Bater	24,48	48-47	220,5	224.4
are enals	olive sheet the 44	Lodel "AC" L	bedra. Griss Can	neater Pead Mr.	467.30		some and manner bearing to				200

3-1/2 OD EU B RO 2-7/8 00 EU B RD 73,62

2-7/4 OB EU 8 RD 73,82

5,968

2.41 61,21 3.00 76,29

4782

4782 x 3

3-1,2 00 EU & RO 88,90

4744 = 3

*** Threads shown below are "standard" for the respective packer alsea. Other threads are available on request. Please specify
threads which orderlya.

*** To use when anticipated conditions aread 200°F (93,33°C) or 3800 PSI (207,167 bytcm2) differential access teel.

*** For the when anticipated conditions aread 200°F (93,33°C) or 3800 PSI (207,167 bytcm2) differential access teel.

*** For the presentative. Use only Baker repair pairs.

EXHIBIT L-6

CASING CEMENTING JOB DATA AND
U.S. EPA INSPECTOR'S REPORTS
(CONDUCTOR PIPE, SURFACE CASING, LONG STRING AND LINER)

ROBINSON ENGINEERING

Oilwell Cementing Division

P.O. Box 5269, Evansville, Indiana 47716-5269	(812)	177- 1575	j	
Date 3.11-71 Field Mires + 15000	dar Na			
Well No. Farm IMCO County By	TLENL		State K	-/
P INCO KECYCLING THE OWNER OF WELL	Tuic	9	, tate	
Mail Addressor well	v 13 5			
H city Mission State KENTUCKY C	ontractor	This.	ייכו כ	 د د د
Depth of 3 Depth of 38 Size Casing 38 Weight				
Kind of Job	(-)	10	-C 34	(8.9) · · · · · · · · · · ·
Kind of Job Caroling Cerrolleting Cerrolleting In P	ient left (Reques Necessi	t in a	Feet
	Unit Pr	ice	Price	13
	174.5			1
	Mary .	10	4.4.1	
Pump Truck PIC- UP	350	32	350	
80 miles a 227 mile		2-2	176	₹
Cement 100 St. CCHSS A	3.45	七	507	=
Cement 100 St CCKSS A (21027) (21027) (21027) (21027)	5 4" 1 1 to "	.65	Sart	*
Additives ZSX CACCIUM Chlung	725	=	50	==
	100	23.7		
Plugs PRIONE		10	Wa:	55 38
	1		94 g	
Other C'EMENT CHICKLATED TO	1.11.11	220 m	16 KSA	Ξ
sunface.	1.4	3/	7.00.70	
The second secon	·/·	OTAL	1570	Carried States
As a part of the consideration of, it is agreed that Oil Well Cementing sha loss, damage or injury to said well resulting from the use of such cementing person engaged in doing such work on the above described well. The above of the owner, operator, or his agent whose signature appears below:	II not be lia	ble or re	sponsible for the acts of the super	or any of any vision
Cementer 15+1CR1 - CHICAEDEL Contractor or Operator	Baren	41	The sales	
Helper Course KIRKET	20651	Signature	KTSIN	- 31
		rint Nam		55.,

ROBINSON ENGINEERING

Oilwell Cementing Division

P.O. Box 5269, Evansville, Indiana 47716-5269	(812) 4	77-157	5	
Date 7-12-71 Field MURGANTOWN	der No	7 t		
Well No. Farm INACA County Bu	TLER		State K	7
F INCO RECYCLING Owner -	TILLO		115	
Mail Address or well	2 8			
Mail Address State City Mail Address State Centucky Company Casing Ca	ontractor_	IN.	$\partial_{z}\partial_{z}$	زير
Kind of Job Sur Fac & g (Circulating Con	ent loft	Reque	t	
Kind of Job 公司公司 (Osca) Weight Circulating Cen in F	ipe by	Vecess	ity 20'	_Feet
	Unit Pri	ce	Price	
	- E. P. E.			•
	1.4		472	
Pump Truck 212- u?	350	AT.	350)	{ \$
Min Kit C. Minnes	_ 3	24	176	18
Cement 7.00 SX CLASS A	5	23.	1200	7
100 Miles (300 de) (34 - 380) (350 / 30)	ا (دف	45	733	(2)
Additives & Six Chickenia Chamber	25	46.4	199	-
Plugs - NIANI				- 2
The state of the s		_		_
Other 3. 978 CENTULLIZEUS	Cc4	73.00	192	3-1
CEMENT CINCULATED TO THE	2.12.11.		110	\dashv
SURFACE.	т, т	DTAL	3057	<u> </u>
As a part of the consideration of, it is agreed that Oil Well Cementing shaloss, damage or injury to said well resulting from the use of such cementing person engaged in doing such work on the above described well. The above of the owner, operator, or his agent whose signature appears below:	il not be liab	ole or re	esponsible f	or any of any vision
Cementer BARRY SCHESKOFN Agent of Contractor or Operator	T. [<u> </u>	Time	
Helper Ginnes Liables	300	Signatur		
	P	rint Nan	18	



UIC MECHANICAL INTEGRITY TEST



Region IV Water Supply Branci 345 Courtland St. NE Atlanta, Georgia 30365 Phone (404)347-3866

WELL IDEN	TIFICATION —
OPERATOR IMCO Recycling, Inc.	
ADDRESS 1503-1511 North 8th St.	WELL NO. INCO Well #1
Sapulpa, OK 74066 PHONE : (9/8)	STATE PERMIT NO. 8//79 POOL
	STATE NAME/CODE KY/21) TN/47 (circle one)
2340 St	NAME BUTTER CODE 031
WELL COI	MPLETION ————————————————————————————————————
WELL TYPE (code)	(It) SURFACE ELEVATION 445.6 (It MSL)
CASING CASING CEMENT CEMENT STRING DIAMETER SHOE VOLUME	PACKER TYPE
(nohae) DEBTU Jacob June	PACKER DEPTH(ft)
Surface 95/8" 466 300 s	
Intermediate	EST. FRACTURE PRES. (psi) PERFORATIONS @ (ff)
Tubing	PERFORATIONS @((t)
NAME	LOWERMOST FORMATION NAME
	USDW BASE ELEVATIONOMSL)
CONFINING TOP ELEVATION MSL)	FORMATION NAME
THICKNESS((1)	NJECTION
	FORMATION TOP ELEVATION MSL
WIT TEG	F DATA
TEST DATE 8/12/91	T DATA
	NJECTED FLUIDSg
EXTERNAL MIT. CEMENT RECORD LOGS	ANNULAR FLUIDSg
	INJECTION RATE(bbl/day)
TYPE OF TEST SHUTHING (check one)	NJECTION PRESSURE
ANNULAR PRE	SSURE TEST-
INITIAL TEST PRESSURE FINAL TEST PRESSURE	_
(psi) (psi)	F PRESSURE CHANGE LENGTH OF TEST (=/- psi) (MINUTES)
ANNULAR SPACE	
COMME	INTS.
NEW WELL CONSTRUCTION.	
Witness comenting of surface cas	in anhe
95/2" TOC @ surface	
Work done by Robinson Engineering	
The waste wy Republic Engineering	· · · · · · · · · · · · · · · · · · ·
1	
OPERATOR LOUIS COMMENTATIVE	_ UIC INSPECTOR & Swid M. Ollham

U.S. ENVIRONMENTAL PROTECTION AGENCY Notice of Inspection

ADDRESS (EPA Regional Office)

Environmental Protection Agency Region IV, Ground Water Protection Branch 345 Courtland St. NE Atlanta, Georgia 30365 404—347—3866 INSPECTION CONTRACTOR

McCoy ≥ McCoy, Inc. P.O. Box 11279 Lexington, Kentucky 40574 606-233-7774 FIRM TO BE INSPECTED
IMCO Recycling, Inc.
1503-1511 North 875 St.
Sapulpa, OK 74066

DATE 8/12/91

HOUR

This document constitutes written notice pursuant to 42 U.S.C.§300j-4 (b)(1) of inspection by duly authorized personnel of the U.S. Environmenta Protection Agency of this facility noted below.

REASON FOR INSPECTION New Well Construction

The purpose of inspection is to determine whether the person (including any corporation or partnership) subject to any applicable underground injection control program has acted or is acting in compliance with The Safe Drinking Water Act and all regulations promulgated thereunder, including underground injection control (UIC) regulations and any applicable permit or rule.

IMCO Well #1 KYI0429

Ran 471' of 95/8" casing, 36 /bs/ft., to 466' below ground level and circulated 300 sks A' cement w/ 4% Cacl followed by 34 bb/s water.

Section 1445(b) of the SDWA (42 U.S.C. §300)-4 (b)) is quoted on the reverse of this form.

Receipt of this Notice of Inspection is hereby acknowledged.

FIRM REPRESENTATIVE

DATE

8/12/91

INSPECTOR (McCoy & McCoy)

DOWELL SCHLUMBERGER INCORPORATED

	TREATMENT	NUMBER	DATE	1-7
ı	STAGE	DISTRICT .		

DS-496 PRINTS	ED IN USA				DOWEL	L SCHL	UMBERG	ER IN	CORPOR	RATED)	STAGE	OS.	i	DIST	RICT	-2		•
WELL NAME AND	NO.		70	OCATIO	N (LEGAL)			RIC	NAME.	19 0		-						- 20	
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SPECIAL INSTRU	CTIONS				ZIP CODE			4	DEPTH		5000			15	DEPTH				
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ROTATE		RPM REC	PHOCATE				ers / 5			<u> </u>					VOLUME				В
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0001 to 2400	OR DP	CASING	INCREMENT	CUM	INJECT	FLUID	PLUID DENSITY					SERVI	CE LOC	DE	TAIL				
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T					27		2,472,020,000									ا	BLS		DENSITY
2	459	1.4	11.				53-3								7	7	5	$+\!$	14/ 8
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BREAKDOWN FLL					VOLUME				DEI	NSITY	PRES	SURE			MAX.	300) MIN	0	
TATION S			RUNNI		CIRCULATIO	V LOST			O YE	s XN	O Ceme	nt Circulat	ed To S	urt	YES	□ NO	2	5	Bbi
BREAKDOWN		FINAL		PSI :	DISPLACEME	NT VOL.	90	7		Bb	IS TYPE	O OIL	~ a	STO	RAGE		RINE W	ATER	
Washed Thru Per	ts 🗆 YES	C NO TO		FT	MEASURED (DISPLACE	MENT #	£ -	CS 01	WIRELIN	E WELL	GAS	クバ	UNTE	PAGE THON	1/01	VILDCAT		
PERFORATIONS	/				CUSTOMER (REPRESE	NTATIVE				os	SUP:							
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						11.10	1 8	1 11	- /		700	A 15 15 15 15 15 15 15 15 15 15 15 15 15		.€	. 200	1			

P.O. BOX 4378 HOUSTON, TEXAS 77210 OILFIELD SERVICES INDUSTRIAL SERVICES DSI SERVICE LOCATION NAME AND NUMBER DSI SERVICE ORDER RECEIPT AND INVOICE NO. 2103 acoust there's 103-6901 CUSTOMER NUMBER CUSTOMER PO, NUMBER TYPE SERVICE CODE **BUSINESS CODES** 283 WORKOVER NEW WELL OTHER API OR IC NUMBER CUSTOMER'S MCO Aluminum 2,0,50% SEE OTHER SIDE FOR TERMS & CONDITIONS **ADDRESS** DAY YR. ARIVE NO. DAY YR. TIME CITY STATE AND ZIP CODE SERVICE ORDER RECEIPT OSI will furnish and Customer shall purchase materials and services required in the performance of the following SERVICE INSTRUCTIONS or OSI INDUSTRIAL SERVICE certify that the materials a services listed were authorized a CONTRACT NO. ____ in accordance with the terms and conditions as received and all services performs printed on the reverse side of this form. Consider 7" grade 201-16 420 615 6160 4 2 2-168 053 + 37 661 (300 W) - 652 0182 122 0-1 - 34/15 042 + 14 + 158 021 12 12 12 136 12-12 in a workmanlike manner and th I have the authority to accept ar execute this document. عاد آر العاد المسامرة Ton - 1000 - Fileson COMPLETION CODE COUNTY / PARISH SIGNATURE OF BUSTOMER OR AUTHORIZED REPRESENTAT CODE CITY Contucky Butler Horanion WELL NAME AND NUMBER / JOB SITE LOCATION AND POOL / PLANT ADDRESS SHIPPED VIA IMCO AL MATERIAL EQUIPMENT AND SERVICES USED Recacling IMCS 201175 ITEM/PRICE REF. NO. UNIT QUANTITY UNIT PRICE S AMOUNT Hilling or gong soit 059200- 00= 90 in 2.55 235.50 102971 - 1025 يدجيد 1055,00 1 1055.00 Service Charge 24/100 - 500 512 1.15 555.30 Haulie 244/02 - 200 2101 0.50 1582.40 PACE THAMP / Rearder 159597 - 400 Comet Had -125.00 125,00 5301- 300 Con. 60,00 MC 056702 - 070 Controllizer -70.00 70.00 556511 - 270 \$5.00 00 975.00 7" Baltle Place 056015 - 070 63.00 63,00 20 7" Centert Banket Pack - off Shoe 155008- 070 525,00 25 175,00 053021- 070 شبي 2844.00 2840,00 0501, Class of Coment 053, Comentary agent 040001 - 000 5.75 5/ 450 25 87.50 טעם - טגעניע 15 900 0.33 297.00 007011 - 000 MIT, Brassian Chloride 650 15 0.25 165.00 101074- 050 DIZT Flori loss egent 16 250 6.00 1500,00 1746. Anti from Egent 647001 - 050 94 2.55 239. 4 042, Kolit 029, Cellophare Floke 245019 - 050 15 2200 0.41 902,00 244103- 025 112 1.45 162, 40 100243 - 220 China Chemical 2022 332.50 23 2 23 Si, Euleison Calorile 367005 - 100 15 720 0.34 102,00 Zone lock CWT, Chemical Wash 200632 - cou 420 9m/ 313L 2 30 966.00 100292-000 10 249,00 Using Dowell Schlumberger! Think You Fur SUB TOTAL 15.333.00 LICENSE/REIMBURSEMENT FEE LICENSE/REIMBURSEMENT FEE TKS. STATE % TAX ON S COUNTY % TAX ON S % TAX ON S SIGNATURE OF DSI REPRESENTATIVE TOTALIS

DS 6510



UIC MECHANICAL **INTEGRITY TEST**



Region IV Water Supply Branch 345 Courtland St. NE Atlanta, Georgia 30365 Phone (404)347-3866

WELL IDENTIFICATION —	
OPERATOR IMCO Recycling, Inc. EPA KYS NO. KYIO429	
ADDRESS 1503-1511 North 8th St. LEASE NAME INCO Well	# /
Sapulpa OK 74066	
PHONE # (918) 665-6575 STATE PERMIT NO. 3/179	POOL
STATE NAME/CODE (KY/21) TN/47 (circle one	e)
2340 Me. 160 MD: 14 - I . 34 COUNTY BUFFER	COUNTY 03/
WELL COMPLETION —	
WELL TYPE (code) 4 T TOTAL DEPTH 3998 ((1) SURFACE ELEVATION 44.	S. 6 III MSD
CASING CASING CEMENT CEMENT PACKER TYPE	
STRING DIAMETER SHOE VOLUME PACKER DEPTH	(ft)
Surface 95/8 466 300 s/s/A MAX INJECTING PRES.	(ps0
Intermediate 7" 2542 450 s/s / 4' EST. FRACTURE PRES. PERFORATIONS @	
Production PERFORATIONS @ Tubing	
	ļ
NAMELOWERMOST FORMATION NAME	
BASE ELEVATION	
CONFINING TOP ELEVATION (MSL) FORMATION NAME	
THICKNESS (ft) NJECTION	
FORMATION TOP ELEVATION	aksl)
MIT TEST DATA	
TEST DATE 8/21/91 INJECTED FLUID	Sg
EXTERNAL MIT- CEMENT RECORD LOGS ANNULAR FLUID	Sg
INJECTION RATE	(bbl/day)
TYPE OF TEST SHUT-IN (check one) WJECTION PRESSURE	(psi)
ANNULAR PRESSURE TEST	
INITIAL TEST PRESSURE FINAL TEST PRESSURE PRESSURE CHANGE (psi) (psi) (psi) (psi)	LENGTH OF TEST
φsi) (psi) (-/- psi)	(MINUTES)
ASSOCIATION AND THE PROPERTY OF THE PROPERTY O	
Non Wall Constants Without Till 5	4
7"	tring
1 casing: KSS, 23 16s/ft @93 / ft, = 45 joints, bottom	7 joints were
County of the lasters on end, 15 centralizers.	71 :44 0 44
Cement work by Dowell-Schlumberger out of Mt Carmi, IL.	510 my . 14.8 /65/9
- cement circulated to surface w/ 450 sks followed	by 99 bb/s
water	
REPRESENTATIVE USC INSPECTOR JAVA III	Milham

U.S. ENVIRONMENTAL PROTECTION AGENCY Notice of Inspection

ADDRESS (EPA Regional Office)

Environmental Protection Agency Region IV, Ground Water Protection Branch 345 Courtland St. NE Atlanta, Georgia 30365 404—347—3866 INSPECTION CONTRACTOR

McCoy & McCoy, Inc. P.O. Box 11279 Lexington, Kentucky 40574 606-233-7774 FIRM TO BE INSPECTED

IMCO Recycling, I.

DATE 8/21/9/ HOUR 1:30 = 8/22/9/

This document constitutes written notice pursuant to 42 U.S.C.§300j—4 (b)(1) of inspection by duly authorized personnel of the U.S. Environmental Protection Agency of this facility noted below.

REASON FOR INSPECTION

The purpose of inspection is to determine whether the person (including any corporation or partnership) subject to any applicable underground injection control program has acted or is acting in compliance with The Safe Drinking Water Act and all regulations promulgated there—under, including underground injection control (UIC) regulations and any applicable permit or rule.

IMCO Well #1 KYIO429

Ran 7" to 2542' (base of shale), circulated 450 sks to surface

Section 1445(b) of the SDWA (42 U.S.C. §300j-4 (b)) is quoted on the reverse of this form.

Peceipt of this Notice of Inspection is hereby acknowledged.

FIRM REPRESENTATIVE

lsung

DATE

8/21/91

INSPECTOR (MCCoy & MCCoy)

DOWELL SCHLUMBERGER INCORPORATED P.O. BOX 4378 HOUSTON, TEXAS 77210 OILFIELD SERVICES 90 INDUSTRIAL SERVICES DSI SERVICE LOCATION NAME AND NUMBER DSI SERVICE ORDER RECEIPT AND INVOICE NO. TYPE SERVICE CODE CUSTOMER NUMBER CUSTOMER P.O. NUMBER **BUSINESS CODES** -03-7030 WORKOVER NEW WELL OTHER API OR IC NUMBER CUSTOMER'S NAME SEE OTHER SIDE FOR TERMS & CONDITIONS ADDRESS MO. DAY ARRIVE LOCATION CITY, STATE AND ZIP CODE ORDER RECEIPT SERVICE DSI will furnish and Customer shall purchase materials and services required in the certify that the materials ar performance of the following SERVICE INSTRUCTIONS or DSI INDUSTRIAL SERVICE services listed were authorized an CONTRACT NO. _ ___ in accordance with the terms and conditions as received and all services performe printed on the reverse side of this form. in a workmanlike manner and the 12 30 12100 I have the authority to accept an 1) all Bowerous execute this document. 5 kg. 12 045 , 285-13 13 550 pm () 450 H 2 1 53 MO. DAY YR JOB COMPLETION 11 27 91 SIGNATURE OF CUSTOMER OR AUTHORIZED REPRESENTATIVE STATE CODE | COUNTY / PARISH CODE CITY 41 SOTIMA 03/ WELL NAME AND NUMBER / JOB SITE LOCATION AND POOL / PLANT ADDRESS SHIPPED VIA D1520541 14-1-34 ITEM/PRICE REF. NO. MATERIAL, EQUIPMENT AND SERVICES USED UNIT PRICE UNIT QUANTITY S AMOUNT 238. 50 2.65 059200 - 00 R MINENGE 2 90 Fump +2 1938782050 10 100 1400. 1450, 135, 20 259697-000 22 135. 1,15 Sezvice Charge 05 9100-000 CX 667 767. 104011.09 64,038 10401 (CIASS A 049102-000 23 2852 2,420, 0-10001-000 650 3.737. 045022-050 1.53 429. 155 1300 057011-000 711-117 165 736, 1120 2,184,00 0-127 101036-050 364 6. 105 87 350, 50 047002-050 1.46 105 122 7. 33. ≥5 100383-000 CW.100 321 10 3 327. 2.30 00 D817 000632-000 304+10CE 966. En 1 420 50.00 90 412 Ceutrellzees 22 556031 CYL 1190, 90 £4 045023-050 0-13 105 122 4/2 PACK OFF Shoe 00 1985,00 056021-044 == 1.925 47.50 1,900.00 0-13019-000 Additional Die Bulle Tei Zvoil die 40 125,00 5450-000 Accitional DR Pumper 20 in SUB TOTAL da, 077, 65%

LICENSE/REIMBURSEMENT FEE

STATE

CITY

COUNTY

SIGNATURE OF OSI REPRESENTATIVE

5 TAX ON S

TAX ON S

5 TAX ON S

TOTAL S



CemCADE TM Version 2.5C1
Well Cementing Recommendation

Cosing Well Field County State Rig Name

OD

(in)

7

PREVIOUS CASING

Weight

(ib/ft)

23.000

Cheat

IMCO ALUMINUM
4 1/2 LINER
DISPOSAL WELL
MORGANTOWN
BUTLER
KENTUCKY
UIDIANA DRGL

ID

(in)

G.37

WELL Description

Job Type : Primary
Rig Type : OnShore
Fluid Seturns at : 0.0 ft
Surface Temperature : 32.0 deg.F
Landing Collar MD : 4700.0 ft

Casing Shoe MD

: 4700.0 ft : 100.0 deg.F

BHST Bit Size

: 7 in

1		CASI	NG		
MD	ÖĎ	Weight	מג	Pressur	e (psl)
(ft)	(in)	(lb/fr)	(iu)	Collapse	Burst
4700.0	4.1/2	10.500	4.05	4010	4790

MD

(ft)

2542 0

1	FORMAT	TONS and	SAFETY CH	ECKS	*
MD	Pressure	e (psi)	Fermation	Lithol.	Fluid
(ft)	Fracture	Porc	Name	code	code
4790.0	6768	1175	OPEN HOLE		

1	CALL	PER and HO	LE SIZE D.	ATA	
MD	Caliper 1	Caliper 2	OH	Annular	Equiv.
1			Volume	Excess	Diam.
(ft)	(in)	(in)	(bbl)	(光) [(in)
4700.0	7 7/8	7 7/8	130.01		7 7/8

Kickoff Point Depth: 0.0 ft

	SURVE	Y DATA	
MĎ	Inc	DLS	TVD
(ft)	(deg)	(d/190f) .	(ft)
4700.0	0.0	0.00	4700.0



CemCADE TM Version 2.5C1
Well Cementing Recommendation

FILL Description

Chest Casing Well Field County State R.g Name MCO ALUMINUM
1 4 1/2 LINER
2 DISPOSAL WELL
MORGANTOWN
3 BUTLER
4 KENTUCKY
5 INDIANA DRGL

Fluid in Order Pumped	Volume	Dept	li (ft)	Fili
	(bbl)	Тор	Bottoin	(ft)
Annulus (Top to Dottom)				ē
WATER	69.91	Surface	3031.0	3031.0
WATER	5.00	3031.0	3154.3	123.2
CW100 Wash	10.00	3154.3	3400.7	246.5
WATER	10.00	3490.7	3647.2	246.5
ZONELOCK	10.00	3647.2	3893.7	246.5
WATER	10.00	3393.7	4140.2	246.5
CLS A KCL	22.71	4140.2	4700.0	569.8
Casing (Buttom to Top)				
Casing Slive		4700.0		
Landing Collar		4700.0		
WATER	50.63	Surface	4700.0	3174.7
				¥ 1

Top of Cement (design): 4140.2 ft Top of Tail Slurry : 4140.2 ft

Cement Quantities

CLS A KCL: 93.0 sacks



CemCADE TM Version 2.501

Well Cemesting Recommendation

PUMPING SCHEDULE

Client Casing Weil

Field County

State Rig Rame IMCO ALUMINUM 4 1/2 LINER DISPOSAL WELL MORGANTOWN BUTLER RENTUCKY INDIANA DRGL

Fluid Pumped	Pump Rate bbl/mm	Fluid Volume bbl	Stage Time municis	Eiapsed Time numess	Comments
START JOB:				8 4	CEMENT 4 1/2 LINES
	1				[×
WATER	4.00	5.00	1:15	1:15	
CW100 Wash	4.00	10.00	2:30	3:45	
WATER	4.00	10.90	2:30	6:15	
ZONELOCK	4.00	10.00	2:30	8:45	
WATER	2.00	10.00	5:00	13:45	
CLS A KCL	5.00	22.71	4:32	18:17	
WATER	3.00	50.63	10:52	35:19	!







PACR FRINT INCO ALUMINUM BISPOSAL WELL ROBINSON MORGANTOWN

MT.CARMEL 111. CEMENT 4 1/2 LINER 01-03-7030 11-27-91

EVENTS	START JOB	START PURPING WATER	SEI FAGNEK START PURPING WASH RESET VOLUME 	START PUMPING WATER START CONFLOCK START PUMPING FLUID 1	START PUMPING WATER
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DENSITY U1 DENSITY PPG	დ. გ გ	7.6	7.6	7.7.7.7.7. 2.5.8.8.8.8.8.8.8.8.8.8.8.8.8.8.8.8.8.8.	8.6.6.8
PRESSURE W.H. PRESS	000	214	54.2 52.8 55.8	394 4322 510 496	482 112 154 163
TIME	58:2 54:2 55:0	64 br>64 64 64 64 64 64 64 64 64 64 64 64 64 64 64 64 64 6			00000 00000 00000 00000







PACR PRINT
INCO ALUMINUM
DISPOSAL WELL
ROBINSON
MORGANTOWN

MT.CARMEL ILL. CEMENT 4 1/2 LINER 01-03-7030 11-27-91

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PACR PRINT

INCO ALUMINUM

DISPOSAL WELL

ROBINSON

MORGANTCHN

MT.CARNEL ILL. CEMENT 4 1/2 LINER 01-03-7020 11-27-91

EVENTS	DROP TOP PLUG START DISPLACEMENT
FLOW RATE Ul FLOW1 BPM	
DENSITY U1 DENSITY PPG	
PRESSURE W.H. PRESS	135 135 131 200 24 47 47 47 103 103 1000 1088 1000 1051
TIME HH:MM:SS	03:35:00 03:35:00 03:35:00 03:35:00 03:35:00 03:37:00 03:47:00 03:47:00 03:47:00 03:57:00 03:57:00 03:57:00 03:57:00



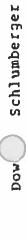


PACR PRINT INCO ALUMINUM DISPOSAL WELL ROBINSON RORGANTOWN

MT.CARMEL ILL. CEMENT 4 1/2 LINER 01-03-7030 11-27-91

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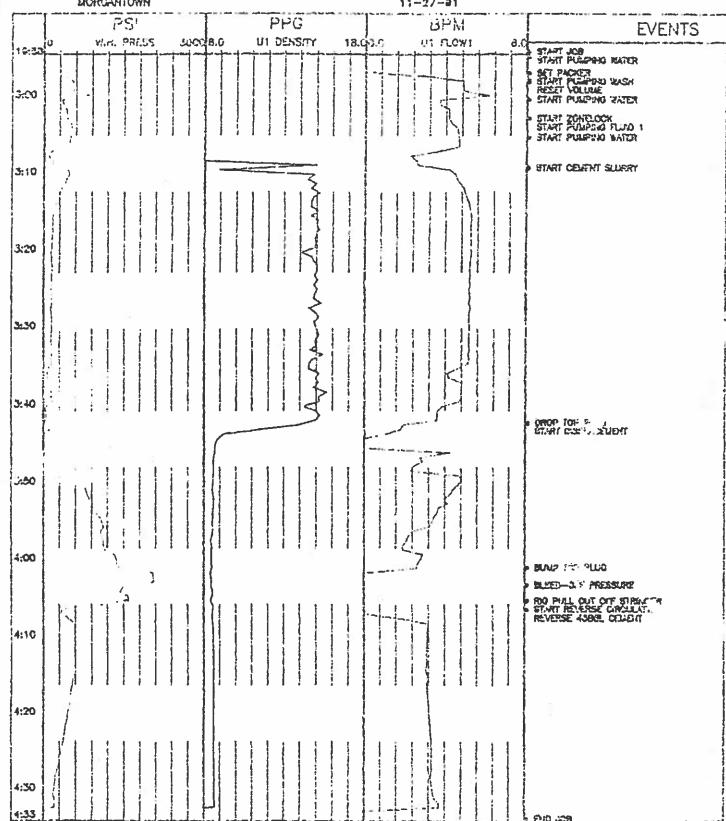
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PACR PLOT



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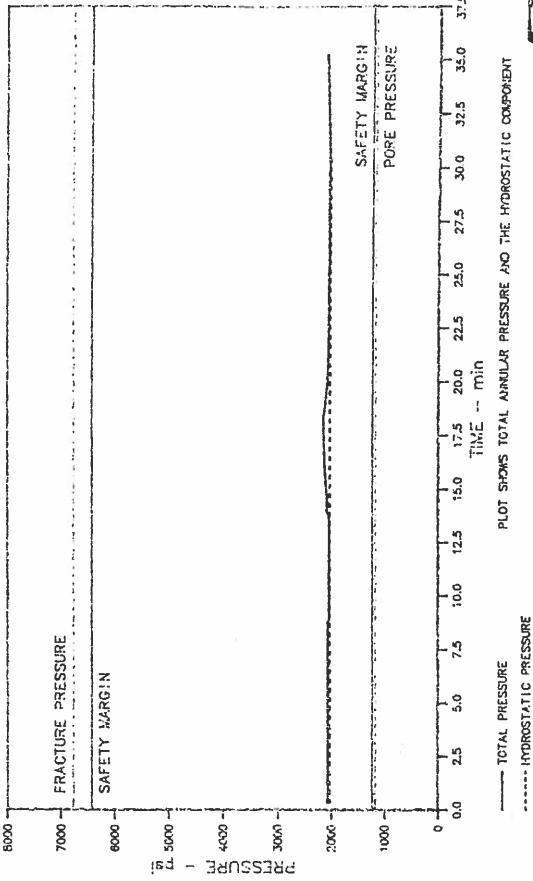
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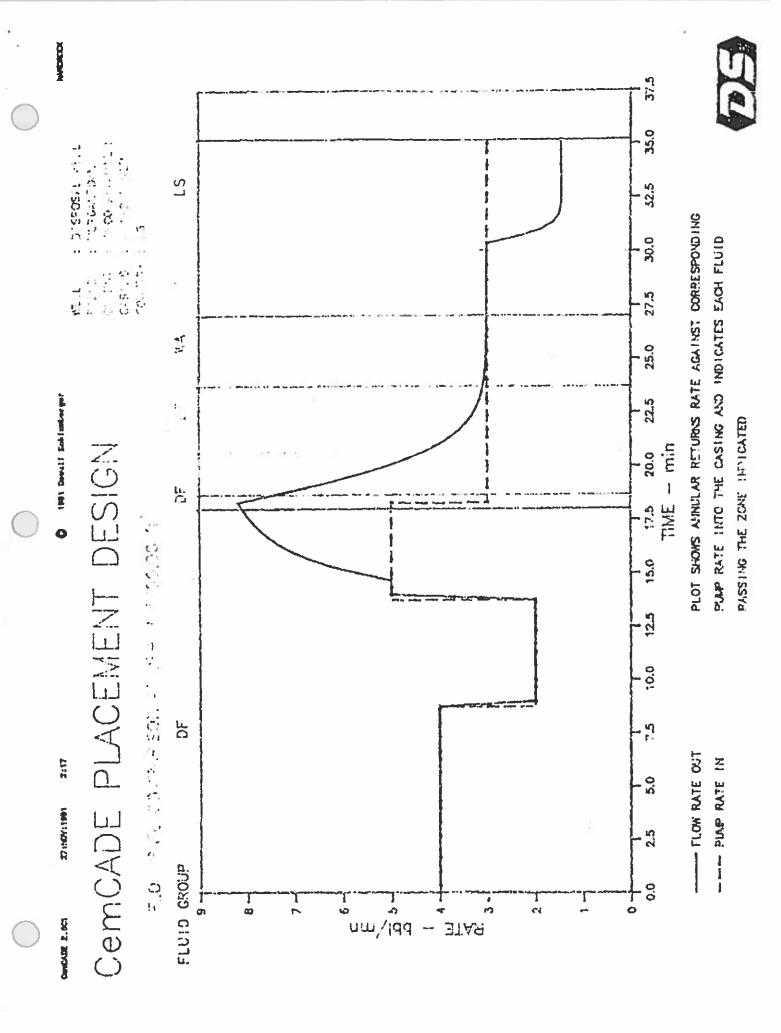
CemCADE PLACEMENT DESIGN

MACHINE

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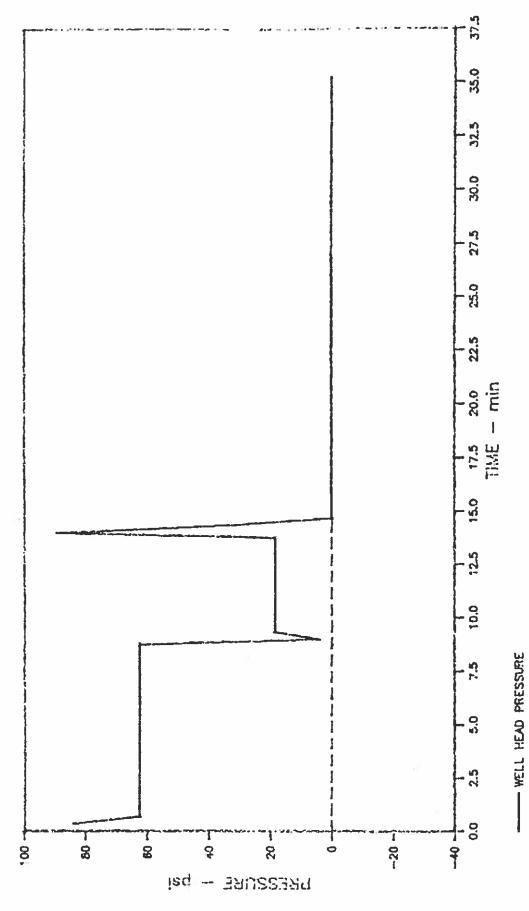
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SET PACKER 7/6 02-16 330 340 7.59 7.89 240 7.89
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DATE STATISTI



OPERATOR

REPRESENTATIVE

New Well Construction UIC MECHANICAL INTEGRITY TEST

S EPA

Region IV Water Supply Branch 345 Courtland St. NE Atlanta, Georgia 30365 Phone (404)347-3866

	WELL IDENTI	FICATION —			
OPERATOR TMCO Recycling,	Inc.		YI0429		
ADDRESS 1503-1511 North		LEASE NAME			
Sapula, OK 74066		METT NO.	MCO Well #		
PHONE # (918) 665-6575		STATE PERMIT NO	8/179 POO	L	
	-	STATE NAME/CODE_	KY/2D TN/47 (circle one)		
2340 =: 160 FE: 14	<u> </u>	COUNTY B	utller	COUNTY OS/	
	<u> </u>				
WELL TYPE (code)	DEPTH 6457- Loggi	PLETION ————————————————————————————————————	ELEVATION 445.6	2 (It MSL)	
CASING CASING CEMENT STRING DIAMETER SHOE			KER TYPE		
(inches) DEPTH	VOLUME (sacks/type)	PACI	KER DEPTH	(0)	
Surface			. INJECTING PRES.		
Production 91/2 2/7/	8 650 sk	EST.	FRACTURE PRES		
Tubing	42% 94	سرن عمر			
		1 OWER LOOF	FORMATION NAME		
NAME		LOWERMOST USDW	BASE ELEVATION	81011	
CONFINING TOP ELEVATION	_OMSL)	Į.	BASE ELEVATION	(MSL)	
FORMATION THICKNESS	(14)	NJECTION	FORMATION NAME		
		FORMATION	TOP ELEVATION	0MSL)	
	MIT TECT	DATA			
TEST DATE 11/26/91 - 11/27/91	——MIT TEST				
_				_	
EXTERNAL MIT- CEMENT RECORD LOGS	ш				
TYPE OF TEST SHUT-IN (check ane)					
INJECTING (check die)		9E0110N FRE330NE		(psi)	
	-ANNULAR PRES	SURE TEST-			
INITIAL TEST PRESSURE (psi)	FINAL TEST PRESSURE	PRESSURE (*/-		TH OF TEST	
ANNULAR SPACE					
COMMENTS					
New well construction - deepen well to new completion zone					
New 4"2" casing: 10.5 #, type K-55 STC (seamless casing with					
short thread collars). 41/2" pipe tally = 2392.91' plus T'long hanger					
= 2400'. Top of hanger	@ 2318. C	sing hung	by Baker Te	of Service	
Out of OKlahama. Cement a	ork by Dowell	- Schlumberg	ser out of Mt.	Carmi, IL.	
Remped 650 sKs (27.053, 37. KCI), chased rubber plus with 50 66/s H.D.					

0~

UIC INSPECTOR Z





INSPECTION CONTRACTOR

McCoy & McCoy, Inc. P.O. Box 11279 Lexington, Kentucky 40574 606-299-7775

FIRM TO BE INSPECTED

IMCO Recycling, Inc.

ADDRESS (EPA Regional Office)

Environmental Protection Agency Region IV, Ground Water Protection Branch 345 Courtland St. NE Atlanta, Georgia 30365 404-347-3379

This document constitutes written notice pursuant to 42 U.S.C.§ 300j-4 (b)(1) of inspection by duly authorized personnel of the U.S. Environmental Protection Agency of this facility noted below.

REASON FOR INSPECTION New Well Construction

The purpose of inspection is to determine whether the person (including any corporation or partnership) subject to any applicable underground injection control program has acted or is acting in compliance with The Safe Drinking Water Act and all regulations promulgated thereunder, including underground injection control (UIC) regulations and any applicable permit or rule.

IMCO Well #1

Ran 23/8" tobing with 7' long hanger and 2393' of 4"2" casing to 4718'. Hung casing at 2318.

Pumped 650 sks = 158 66/s, weight = 14.8 16s/gal, yeild = 1.37 cu. ft. /sk Cement: Class A w/ 2% gyp-seal, 3% KCI, .2% Antiform

(D46), .2% Calcium lignosulfate (D13), and .6% D127

cement work by Dowell-Schlumberger.

After pumping cement (135% calculated volume), rubber plugs were chased w/ 50 bb/s water. Then tubing was disconnected from hanger and excess cement was circulated out of annular space between T'casing and tubing.

Section 1445(b) of the SDWA (42 U.S.C. §300j-4 (b)) is quoted on the reverse of this form.

Receipt of this Notice of Inspection is h	ereby acknowledge	d
FRIM REPRESENTATIVE Tofan Torre	DATE 11/27/91	INSPECTOR (McCoy & McCoy)

EXHIBIT L-7

ANNULUS AND PACKER PRESSURE TEST DATA

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38110 South 1031d C	No.	KODIA SOLUTION	1 Holen Ward 759
Tulso OK - 7/1/16		SHIPPED VIA No. 18 MEDGHT CHARGES	2 LOCATION CODE
WELL TYPE WELL CATEGORY WILL CATEGORY UINCIT 03	WELL PERMIT NO.	Do Kara	3 LOCATION CODE
11-55 UN- T-ST PSCESS 410	B-	OFFICE NO.	REFERRAL LOCATION
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CUSTOMER OR HIS AGENT (SIGNATURE)

CUSTOMER

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· n HALLBURTON SERVICES

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WORK ORDER CONTRACT AND PRE-TREATMENT DATA

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	THE SAME AS AN INCEPENDENT CONTRACTOR TO: $H \prec D$?					100		4
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CUST	OMER OR HIS AGENT WARRANTS THE WELL IS IN PROPER CONDITION	TO RECEIVE TH	E PRODUC	TS, SUPPLIE	S, MATERIA	LS, AND SE	RVICES :	3 + 5
As a) -b)	This Contract Must be say To pay Halliburton in accord with the rates and terms stated in Halliburton's current price payment of Customer's account by the last day of the month following the month in which it but never to exceed 18% per annum, in the event it becomes necessary to employ attorne of 20% of the amount of the unpaid account. To defend, indemnify, release and hold harmless Halliburton, its divisions, subsidiaries, parer any claims, liability, expenses, attorneys fees, and costs of defense to the extent permitted by	fist Invoices are printed invoice in dated, it is enforce collect and affiliated comy law for	nyable NET b Customer agn tion of said a panies and th	y the 20th of the the count, Customer count, Customer officers, direct	a thereon after agrees to pay ors, employees,	obtaunt at the pass collection of a collection	righest lawfut com- osts and altorney rvants of all of the	tract rate applicate fees in the amount of t
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	 Reservoir, formation, or well loss or damage, subsurface trespass or any action in the in Personal injury or death or property damage (including, but not limited to, damage to it 	ha meanurir frameri	on or until o	any damages w	tentament and	eros sut of or in	Any way connec	ted with or men
2. Personal injury or death or property damage (including, but not limited to, damage to the reservoir, formation or well), or any damages whatsoever, growing out of or in any way connected with or result from pollution, subsurface pressure, losing control of the well and/or a well blowout or the use of radioactive material. The defense, indemnity, refease and hold harmless obligations of Customer provided for in this Section b) and Section c) below shall apply to claims or liability even if caused or contributed to by Haliburton negligence, strict liability, or the unseaworthness of any vessel owned, operated, or humished by Haliburton or any, defect to the data, products, supplies, materials, or equipment of Haliburton whether the preparation, design, manufacture, distribution, or marketing thereof, or from a failure to warm any person of such defease, indemnity, release and hold harmless obligations of Customer and apply where the claims or liability are caused by the gross negligence or willful misconduct of Haliburton. The term fulliburton as used in said Sections b) and c) shall mean Haliburton, its division.								
c)	subsidiaries, parent and affiliated companies, and the officers, directors, employees, agents as subsidiaries parent and affiliated companies, and the officers, directors, employees, agents as That because of the uncertainty of variable well conditions and the necessity of relying on the subclies or materials, nor the results of any treatment or service, nor the accuracy of any civil tuse their best efforts in gathering such information and their best judgment at interpretary damages arising from the use of such information. That Halliburton warrants only title to the products, subplies and materials and that the CE MERCHANTARILITY STINESS OR OTHERWISE WHICH EXTEND RESCOND THOSE ST	acts and supporting	services fun	ashed by others.	Halliburton is u	nable to guaran	tee the effectiven	ess of the produ
d)	cause of action (whether in contract, tort, breach of warranty or otherwise) arising out of the or materials on their return to Haliburton or, at Haliburton's option, to the allowance to the	o sale or use of any	products, su	polies or material	la is expressly	on's liability and	Customer's exch	sive remedy in
e)	punitive or consequential damages.					thati pay Hallicus		

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the lesser of its replacement cost or the cost of repairs unless such damage is caused by the sole negligence of Halliburton. In the case of equipment, looks or instruments for marine operations, Custor shall, in addition to the foregoing, be fully responsible for loss of or damage to any of Halliburton's equipment, looks or instruments which occurs at any time after delivery to Customer at the landing unless such loss or damage is caused by the sole negligence of Halliburton's equipment, looks or instruments which occurs at any time after delivery to Customer at the landing unless such loss or damage is caused by the sole negligence of Halliburton's equipment, looks or instruments which occurs at any time after delivery to Customer at the landing to which occurs at any time after delivery to Customer at the landing to what the provisions of the Deceptive Trade Practices - Consumer Protection Act, to the extent permitted by law.

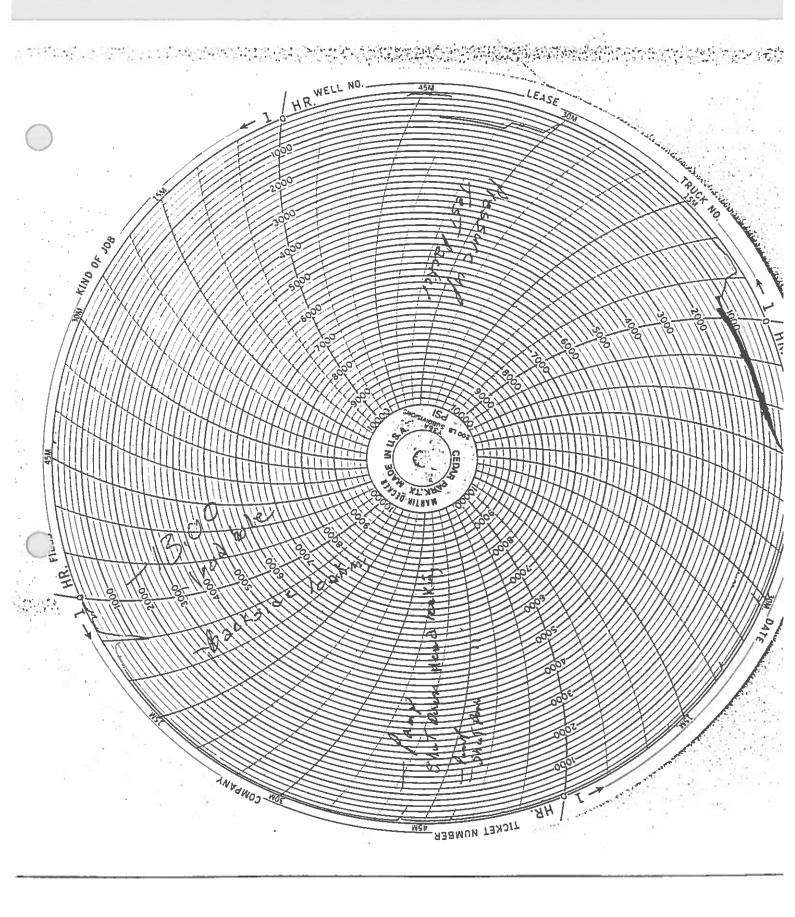
That this contract shall be governed by the law of the state where services are performed or materials are lumished.

That Halliburton shall not be bound by any changes or modifications in this contract, except where such change or modification is made in writing by a duty authorized executive officer of Halliburton.

THAVE READ AND UNDERSTAND THIS CONTRACT AND REPRESENT THAT (AM AUTHORIZED TO SIGN THE SAME AS CUSTOMER'S AGENT.

A.M. P.M.

CUSTOMER





UIC MECHANICAL INTEGRITY TEST

EPA

Region IV Water Supply Branch 345 Courtland St. NE Atlanta, Georgia 30365 Phone (404)347-3866

WELL IDENTIF	ICATION ——————
73:00 3 11	EPA KYS NO. KYS 03/0//7
ADDRESS 1503-1511 North 8th Street	LEASE NAME IMCO Well #1
Sapulpa, OK 74066	
1	STATE PERMIT NO. 81179 POOL NIA
77.110 - 1/0 - 1/1 7 711	STATE NAME/CODE KY/21 TN/47 (circle one) COUNTY COUNTY
2340 FEL: 160 FEL: 14 - I - 34	NAME Butler COUNTY 03/
WELL COMP	LETION —
WELL TYPE (code) # 1 TOTAL DEPTH 6457	(III) SURFACE ELEVATION 445.6 (III MSD
CASING CASING CEMENT CEMENT STRING DIAMETER SHOE VOLUME (Inches) DEPTH (sacks/type)	PACKER TYPE Baker R-3 Double-grip PACKER DEPTH 4690.83
Surface 95/8 47/ 300 /	A MAX. INJECTING PRES. 2.700 (psi)
Intermediate 7" 2542 450/	EST. FRACTURE PRES. 3300 + (psi) PERFORATIONS @ Open Hale (iii)
Tubing 3 1/2" 0 - 2247	PENTORATIONS & OPEN // R/C
27/8" 2247-4690	FORMATION NAME Penn. Sand
NAME New Albany to top of Knox	USDW BASE ELEVATION 250 MSU
CONFINING TOP ELEVATION 2330 MSL)	
FORMATION THICKNESS 2370 (III)	NJECTION FORMATION NAME KILOX
:ta	FORMATION TOP ELEVATION 4700 (MSL)
MIT TEST (ATA
	ECTED FLUIDSg
EXTERNAL MIT- CEMENT RECORD LOGS	NULAR FLUIDSg
COURT BY	ECTION RATE(bbl/day)
TYPE OF TEST SHUT-IN (check one) INJ	ECTION PRESSURE(psi)
ANNULAR PRESS	URE TEST
INITIAL TEST PRESSURE FINAL TEST PRESSURE	PRESSURE CHANGE LENGTH OF TEST
(psi) (psi) (psi) ANNULAR SPACE 309 303	(-/- psi) (MINUTES) -6 30
COMMEN	15
95/8" T.O.C. @ surface; 7" T.O.C. @	surface: 4"2"- comented.
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OPERATOR REPRESENTATIVE In Trum	UIC INSPECTOR Saved M. Ollham

704/10 NOTICE OF ROUTIN INSPECTION



INSPECTION CONTRACTO	R FIRM T	O BE INSPECTED	CAN THE SECOND S	ADDRESS (EPA REGIONAL OFFICE)										
TSA, Inc. 598 College St. Winchester, KY 40391 606-737-3641		NAME / ADDRESS	Environmenta 100 Alabama Atlanta, Geon 404-562-9424	gia 30303										
his document constitutes written no rotection Agency of this facility note	otice pursuant to 42 U.S. ed below	C.§300j-4(b)(1) of inspection by	duly authorized p	ersonnel of the U.S. Enviro	nmenu									
EASON FOR INSPECTION The purpose of inspection is to de has acted or is acting in complian and any applicable rule.	ice with The Safe Drinking Wal	ncluding any corporation or partnership) ler Act and all regulations promulgated t	subject to any applica hereunder, including u	ble underground injection control p nderground injection control (UIC)	irogram regulatio									
Lease Name / Well No	EPA ID NO.	Location	Well Status	Comments	19 1									
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Section 1445(b) of the St	DWA (42 U.S.C. §300)-4	(b)) is quoted on the reverse of	IIIS IOITIL		273 (
Additional Comments					-									
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WORLD 100 100 100 100 100 100 100 100 100 10														
Receipt of this Notice of Routine Is	nspection is hereby ackn	owledged												

A Inc. NOTICE OF INSPECTION

INSPECTION CONTRACTOR

TSA, Inc. 598 College St. Winchester, KY 40391 (606) 737-3641

FIRM TO BE INSPECTED

ADDRESS (EPA REGIONAL OFFICE)

Environmental Protection Agency Region IV 100 Alabama St. SW Atlanta, Georgia 30303

(404) 562-9424

TO THE PERSON HE THE ABOUT

TOTAL CHARGE ASIA, REPORT

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This document constitutes written notice pursuant to 42 U.S.C.§300j-4 (b)(f) of inspection by duly authorized personnel of the U.S. Environmental Protection Agency of this facility noted below.

REASON FOR INSPECTION

The purpose of inspection is to determine whether the person (including any corporation or partnership) subject to any applicable underground injection control program has acted or is action in compliance with The Safe Drinking Water Act and all regulations promulgated thereunder, including underground injection control (UIC) regulations and any applicable permit or rule.

Section 1445 of the SDWA (42 U.S.C. § 300j-4 (b)) is quoted on the reverse of this form

Receipt of this Notice of Inspection is hereby acknowleged.

OPERATOR REPRESENTATIVE

DATE

TSAINC UIC MECHANICAL INTEGRITY TEST

Region IV Water Supply Branch 100 Alabama St. SW Atlanta, GA 30303

	WELL IDENTIFICATION
	OPERATOR /NCO Recycling INC EPAID NO. 03/01/7
	ADDRESS 609 GARDIER CANDRO LEASE/WELL NO. PINCD #/
	11/0850170-11/ kg 7261-1010 STATE PERMIT NO. 81179 POOL 1/A
	PHONE NO. (SU?) 526-5688 DOW TANK BATTERY REG NO. NA
	2340 /60 (FEL) /4 I -3/ LATITUDE LONGITUDE
	WELL COMPLETION
	WELL TYPE(CODE) 2- TOTAL DEPTH 6457 (ft msl)
	CASING CASING CEMENT CEMENT TOP. TOC
	STRING DIAMETER SHOE VOLUME OF CALCULATED (inches) DEPTH (sacks / type) CEMENT FROM
	SURFACE $\frac{9\%}{2}$ $\frac{477}{300}$ $\frac{300}{2}$ $\frac{2}{4}$ $\frac{4}{3}$ RECORDS
	INTERMEDIATE 7 2542 450 SVA SAC CBL
41	PRODUCTION $\frac{47}{2300-4703}$ $\frac{2300-4703}{6500}$ $\frac{6500}{6500}$ $\frac{6500}{6500}$ $\frac{6500}{6500}$ $\frac{6500}{6500}$ REMEDIAL $\boxed{}$
	TUBING $\frac{3/2}{2.7/2} = \frac{0-2.77}{2.7+7-4690}$
	PACKER TYPE 3 / 2 - 2 FORMATION NAME / /CX
	PACKER DEPTH - 10, 83 INJECTION
	PERFORATIONS FORMATION TOP ELEVATION
	OPERATIONAL DATA
7	INJECTED FLUID Ziz vie (bbl/day)
	ANNULAR FLUID 11-1 Were 2 INJECTION PRESSURE (psi)
1.00	SHIT IN CO. SINCE CASING INJECTOR CO.
L	WELL STATUS TYPE CASING INJECTOR
	L ACTIVE
	ANNULAR PRESSURE TEST ANNULAR PRESSURE TEST PRESSURE CHANGE LENGTH OF TEST
	ANNULAR INITIAL TEST PRESSURE FINAL TEST PRESSURE PRESSURE CHANGE LENGTH OF TEST SPACE (psi) (minutes)
	343 343 30
から	N/A = INFORMATION NOT AVAILABLE COMMENTS
3	
1	OPERATOR REPRESENTATIVE DATE UIC INSPECTOR (TSA Inc.)
1	
	(Later 1 10-28-97 / 15/2

ATTACHMENT M CONSTRUCTION DETAILS

Subsurface:

The construction details are discussed in Attachment L and are shown on Figure L-1.

Wellhead:

Figure M-1 shows the details of wellhead construction.

Surface Facilities:

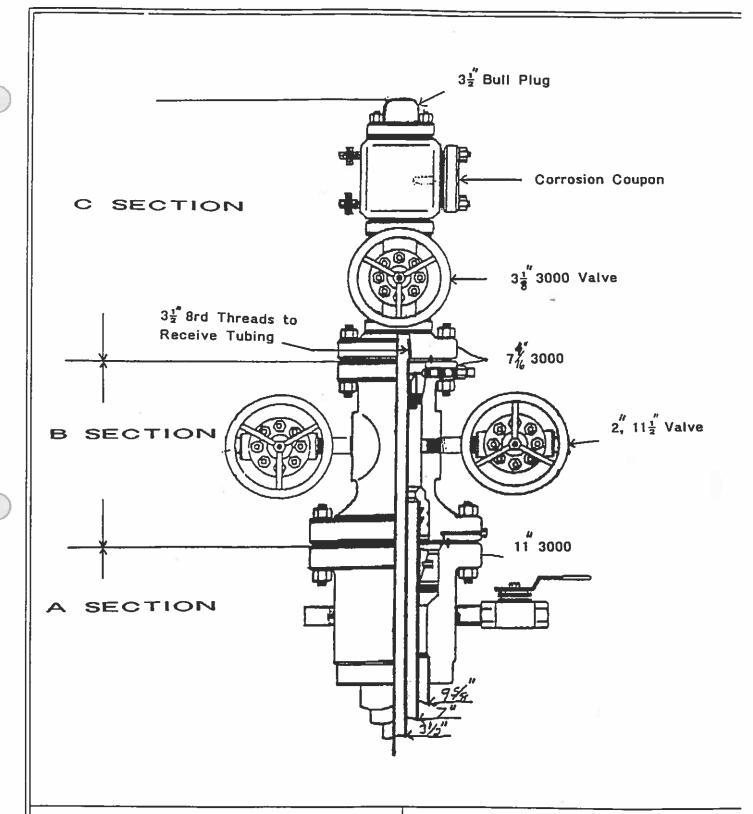
Surface facilities include fluid suction system, filtration system and injection pumping system. The surface facilities (filtration, injection pumping and wellhead systems are enclosed in a building.

Suction System - The suction system consists of two 2-horsepower Teel Model 1P897 centrifugal pumps, each with separate intake screens located in the pond. Detail drawing of suction system is shown on Figure M-2. The suction system is also equipped with backwash system.

Filtration System - The filtration system consists of two Tritan Model TR 140 sand filters with a filter size of 50 microns and greater. Each filter unit is rated at 140 gallons per minute and can be operated independently or together. The system also has backwash capability. The filtration system and suction system are connected with 3" plastic pipe of approximately 450 feet in length. Detail drawing of filtration system is shown on Figure M-3.

Injection Pumping and Monitoring System - The filter system and the injection pump at the wellhead are connected together with 3-inch diameter steel supported rubber hoseline. The injection pump consists of a Wheatley Triplex Plunger pump. The flow rate with a 6.5-inch sheave on the drive motor is 65 gpm. The pump discharge pressure is regulated by a Hydro-Seal pressure relief valve adjustable from 500 psig to 2,000 psig. The bypassed or relief fluid flows through a separate 2-inch plastic line back to the pond. The system is designed to operate at 1,750 psig or less due to the horsepower limitation of the drive motor.

The drive motor is an electric 3-phase 460-volt ac 100 horsepower motor with a 405T



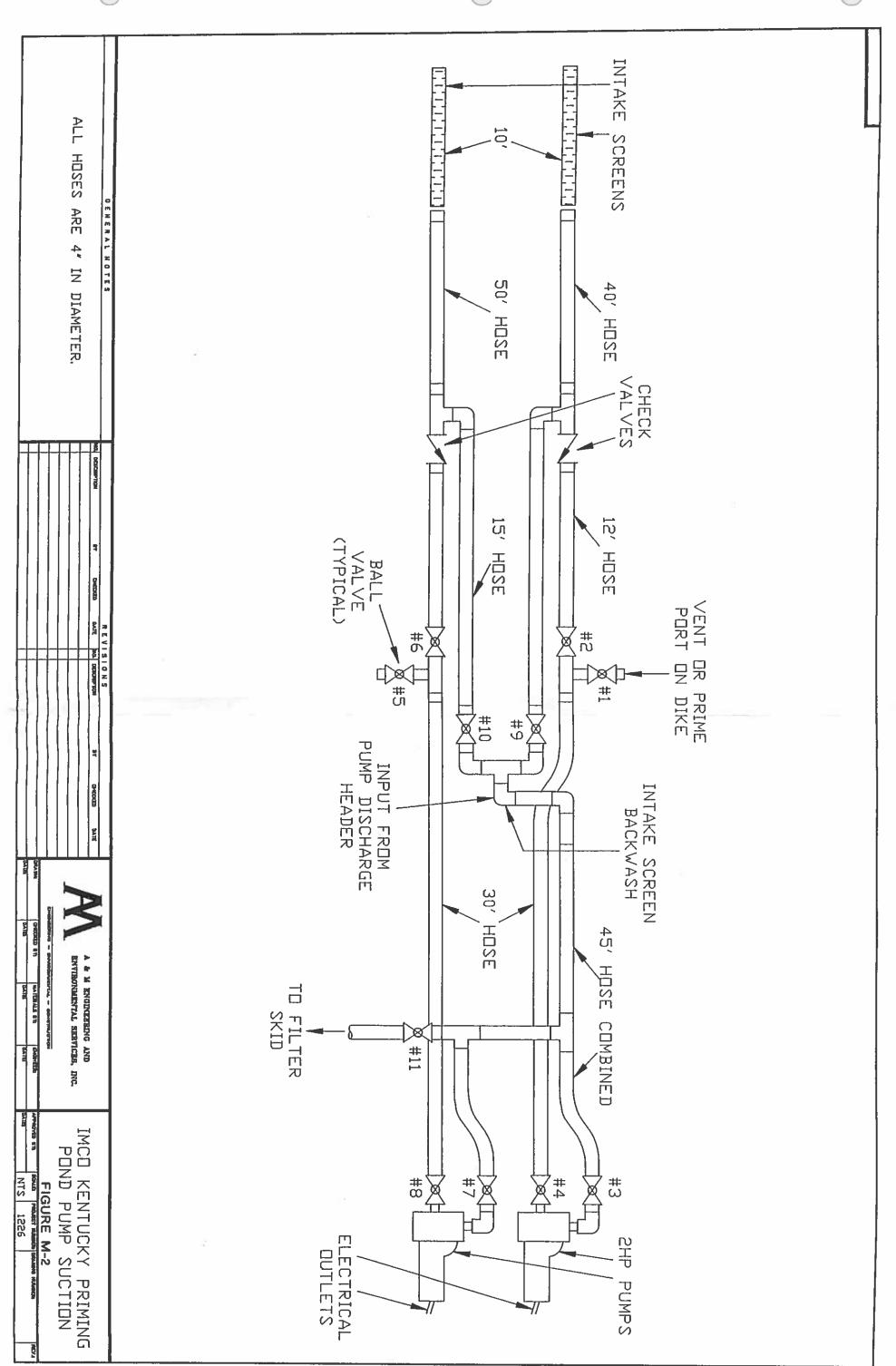
M

A & M ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

ENGINEERING - ENVIRONMENTAL - CONSTRUCTION

WELLHEAD

SCALE:	DATE:	FIGURE NO.
APPROVED BY:	DRAWN BY:	DRAWING NO.



frame. The starter is a reduced voltage starter for reducing the surge in the power grid. The motor is thermally protected by the starter from overload.

Suction pressure of 10 psig or greater is required to start the injection motor. The suction pressure is monitored by a Dresser/Ashcroft Model B424B normally open pressure switch and one pen of a PMC Model 212-2 seven-day dual pen chart recorder.

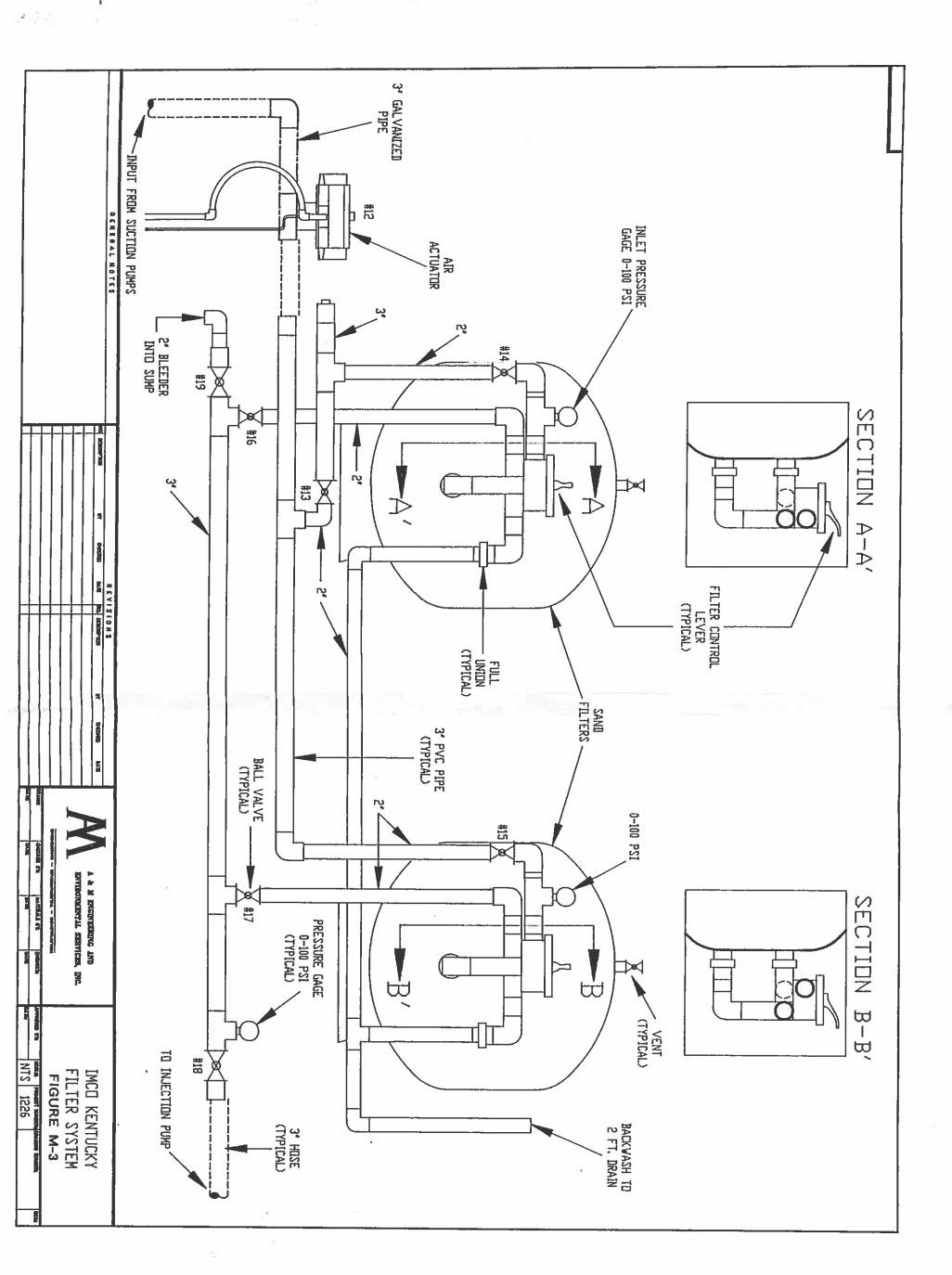
The discharge pressure which is the same as the injection pressure is monitored by the other pen in the PMC recorder and a Dresser/Ashcroft Model B424B normally pressure switch set at 400 psig. The chart pressure range is from 0 to 2,000 psig. The pressure switch closes when the discharge pressure rises above 400 psig which is only used when the system is in automatic. In the manual mode, the discharge pressure switch is not in the control circuit.

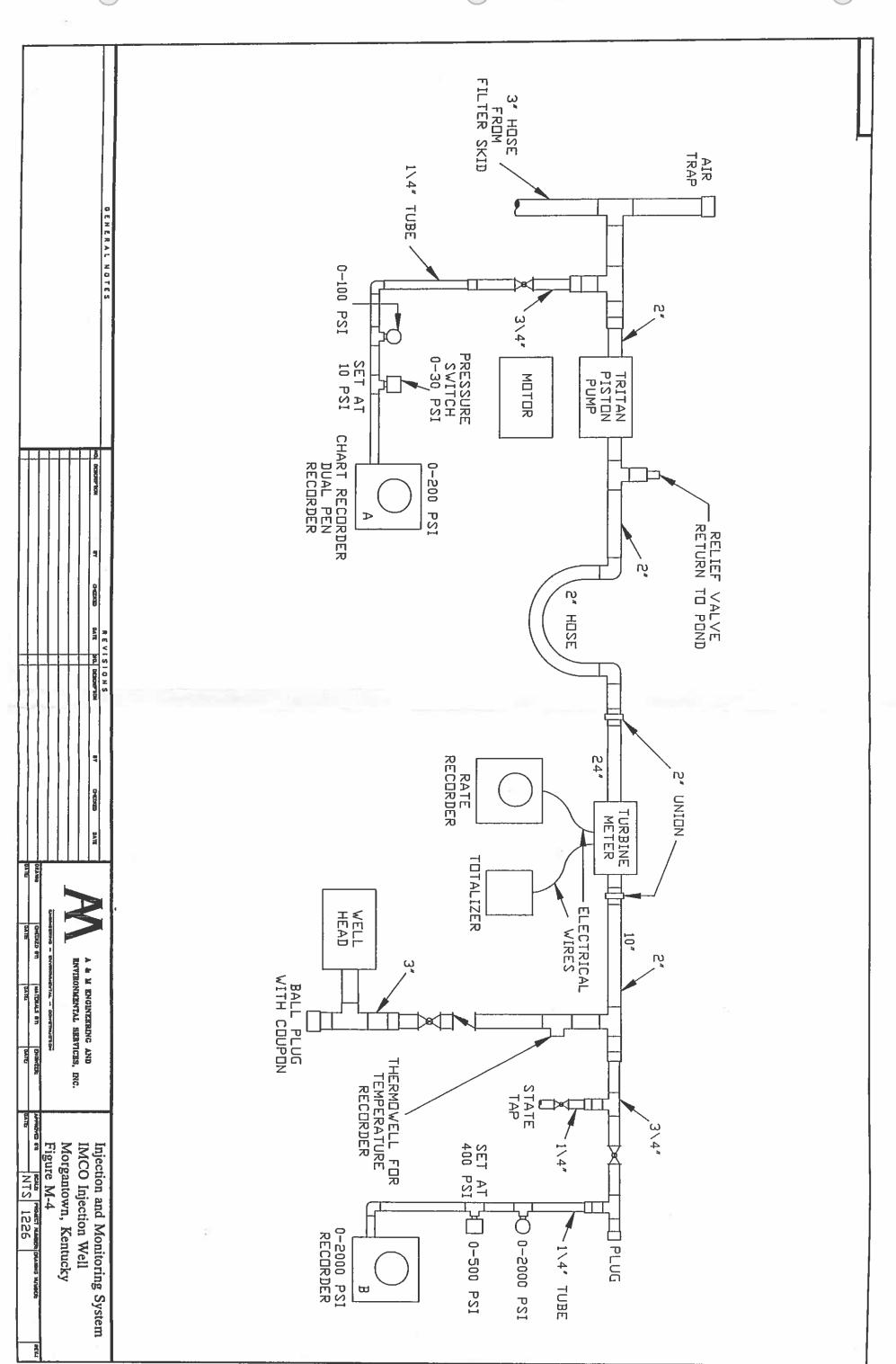
A 2-inch Daniels Model CR turbine meter is used to measure the flow of fluid into the injection well. A Daniels Model 2403 battery powered totalizer is used to maintain the records of how many gallons of fluid have been injected into the well. The system works by the turbine blades located in the stream of fluid rotating past a magnet which produces up an electric signal each time a turbine blade passes the magnet. The totalizer counts the electric pulses and converts these into gallons. Specifically, each gallon produces 116 pulses with the 2-inch flow meter. This dividing number is manually set into a register in the totalizer.

The same pulses are fed parallel into a Transpak Frequency Input Isolating Two Wire Transmitter Model T671 and converted into a 4 to 20-milliamp signal. With no flow, the signal is 4 milliamps and with 100 gpm, the signal is 20 milliamps. This signal is fed into a Partlow Model ARC 4100 seven-day chart recorder to provide a recording of the instantaneous flow rate into the injection well.

The injection fluid temperature is monitored by a C.E. Invalco Pressure/Temperature recorder. The temperature range is from 0 to 150 degrees F.

Detail drawing of the system is shown on Figure M-4.





ATTACHMENT N NOT APPLICABALE

ATTACHMENT O PLANS FOR WELL FAILURES

Emergency procedures for the IMCO injection well are simplified by:

- 1) the fact that no hazardous fluids will be injected, and
- 2) high pressure and low-pressure switches are installed in the system.

The pressure switches are connected to the actuator and to the injection pump and the suction pump. In case of emergency (higher pressure or lower pressure than normal operation pressure), the pressure switches will actuate the actuator to close the ball valve at the wellhead and turn off the pumps to stop fluid suction from the pond and stop fluid injection. When the injection pump and the suction pump shut off, no injection fluid will be transported from the retention pond to the injection well. Thus, a spill amount will be very limited.

In the event of an emergency involving a spill in the vicinity of the suction and filter system, the wellhead or along the hose, the first response shall be containment of lost non-hazardous fluid in a diked and lined area around the source of the spill. Then this lost non-hazardous fluid will be returned to the pond for reinjection by placing a small portable pump equipped with flexible hose. In such situations, IMCO will notify the U.S. EPA Region IV Groundwater Division, UIC Section within 24 hours of occurrence (404-562-9900).

Repair work shall commence as soon as emergency clean-up procedures are complete. A report will be prepared and submitted to U.S. EPA Region IV.

ATTACHMENT P MONITORING PROGRAM

Monitoring represents the feed back mechanism which defines the success of the project and quickly identifies developing problems. During well operation, IMCO Recycling Inc. monitors quality of injected fluid, injection pressure, injection temperature, annulus pressure and flow rate. The monitoring results are reported quarterly to U.S. Environmental Protection Agency, Region IV.

Also, every five years a mechanical integrity test of the well will be conducted and the results of the test will be reported to U.S. EPA, Region IV.

Quality of Injected Fluid:

Since the only fluid to be injected is the leachate (salt water) from the landfill and contaminated runoff water from the IMCO facility, no major changes are expected in chemical and physical characteristics of the injection fluid. Sampling of injection fluid will be on a quarterly basis. A grab sample will be obtained from the retention pond and submitted to a qualified laboratory for analysis. The sample will be analyzed for the following parameters:

DΗ specific gravity barium ~ sulfate calcium" total iron bicarbonate~ sodium ~ ammonia carbonate~ magnesium / chlorides~ cadmium~ aluminum 🗸 lead ~ total suspended solids total dissolved solids carbon dioxide hydrogen sulfide ~ dissolved oxygen~

Results of laboratory analysis will be submitted to U.S. EPA. Region IV with the quarterly report.

Injection Pressure:

The injection pressure is monitored continuously through a recorder placed at the wellhead. In each quarterly report the highest, average and the lowest injection pressures will be reported for each month.

Injection Temperature:

The temperature of the injection fluid will be monitored continuously and will be recorded on the chart. In each quarterly report the minimum, average and the maximum temperatures will be reported for each month.

Annulus Pressure

The annulus of the injection well is maintained at a minimum positive pressure of 10 psig at the wellhead. Then the annulus pressure of the injection well will be monitored continuously on a pressure recorder. In each quarterly report the minimum, average and the maximum annulus pressure will be reported for each month.

Flow Rate:

The flow into the IMCO injection well is continuously monitored with a totalizer that is set in the injection line. The totalizer is a digital flow meter that records the total flow in. The totalizer readings are done daily so that the daily flow rate can be calculated from the daily flow in. Table P-1 shows the daily record sheet that is used at the IMCO injection well. Also, a flow rate recorder is installed to continuously record the flow rate on the chart. In each quarterly report the minimum, average and the maximum flow rates will be reported each month.

Record Keeping:

The pressures, temperature and flow rate recorder charts and the daily record sheets are kept on file for five years and are open for inspection. After five years they may be disposed.

IMCO RECYCLING, INC.

IMCO INJECTION WELL

OPERATION PERMIT NO.

SHEET
RECORD
DAILY

FILTER OUTLET PRESSURE	35 5-27			*C													
SUCTION PUMP PRESSURE			İ														
ANNULUS PRESSURE																	
TEMP																	
INJECTION PRESSURE																	
AVERAGE FTOW RATE																	
TOTAL AMOUNT INJECT, SINCE LAST READING																	
TOTALIZER READING																	
OPER																	
TAGE																	
DATE																	

ATTACHMENT Q PLUGGING AND ABANDONMENT PLAN

Through tubing, a plug will be set in the landing nipple below the 4 1/2" x 2 7/8" packer. The 2 7/8" and 3 1/2" tubing will be released from the packer and pulled out of the well. The 4 1/2" casing will be tested with 10 lbs/gallon brine plus 500 psig. Tubing will be run and the well will be cemented from 4703 feet to 2200 feet depth with approximately 500 sacks of sulfate resistant cement. The remaining part of the well (2200 to 40 feet depth) will be filled with mud and a cement plug will be installed at the top. The wellhead will be removed and a marker containing the date of plugging and permit number will be installed.

U.S. EPA, Region IV will be notified of the exact time during which plugging operation will take place.

The cost of plugging and abandonment is estimated at \$10,000 in 2001 dollars. See Attachment R for the assurance and availability of the resources for this cost.

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ATTACHMENT R NECESSARY RESOURCES

Enclosed is an irrevocable standby letter of credit to assure availability of resources.

AMERICAN NATIONAL Bank and Trust Company

P.O. BOX 1408, SAPULPA, OKLAHOMA 74066 - 9181 224-3210



GUY L. BERRY 111, PRESIDENT AND CHIEF OPERATIONS OFFICER

May 3, 1990

Regional Administration Environmental Protection Agency Region IV 345 Courtland Street, N.E. Atlanta, Georgia 30365

Dear Sir or Madam:

We hereby establish our Irrevocable Standby Letter of Credit No. 523 in your favor, at the request and for the account of IMCO Recycling, Inc., P. O. Box 1070, Sapulpa, Oklahoma 74067 up to the aggregate amount of Ten Thousand and No/100 U. S. Dollars (\$10,000.00), available upon presentation of:

- 1. Your sight draft, bearing reference to this letter of credit No. 523, and
- Your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under authority of the Safe Drinking Water Act."

This letter of credit is effective as of May 15, 1990, and shall expire on May 15, 1991, but such expiration date shall be automatically extended for a period of at least one year on May 15, 1991 and each successive expiration date, unless, at least 120 days before the current expiration date, we notify both you and IMCO Recycling, Inc. by certified mail that we have decided not to extend this letter of credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and IMCO Recycling, Inc., as shown on the signed return receipts.

Whenever this letter of credit is drawn on under and in compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we shall deposit the amount of the draft directly into the standby trust fund of IMCO Recycling, Inc. in accordance with your instructions.

This Letter of Credit is subject to the most recent edition of the Uniform Customs and Practice for Documentary Credits, published by the International Chamber of Commerce Publication No. 400, (1983 Revision).

Yours truly.

GUY L. BERRY, III President and

Chief Operation Officer

Juny L. Berry 1112

GLB/ka

Attachment to Irrevocable Standby Letter of Credit No. 523. Identification of Facilities and Cost Estimates

Owner or Operator: IMCO Recycling, Inc.

American National Bank and Trust Company of Sapulpa, Oklahoma

Name of facility

IMCO Recycling, Inc.

Address of facility

609 Gardner Camp Road

Highway 1468

Morgantown, Kentucky 42261

Current plugging and abondment cost estimate

\$10,000.00

Date of estimate

May 2, 1990



3840 S. 103RD E. AVENUE TULSA, OK 74146 ENGINEERING - ENVIRONMENTAL - CONSTRUCTION (918) 665-6575

July 10, 1990

Mr. William Mann
UIC Section
Groundwater Protection Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia, 30365

Re: IMCO Injection Well Permit Application KYI0429

Dear Mr. Mann:

Please find enclosed the properly executed "Standby Trust Agreement" for the above mentioned application. I believe, with this form, the application requirements are completed. I understand that after issuing the draft permit, your department will be publishing the "Public Notice".

Thank you for your help, and if there is anything we can do to speed up the process, please let me know.

Very truly yours,

A & M ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

Irfan Taner Geologist

Enclosure

IT:bam

xc: Tom Rogers
Dick Kerr

STANDBY TRUST AGREEMENT

U.S. Environmental Protection Agency Underground Injection Control Financial Responsibility Requirement

TRUST AGREEMENT, the "Agreement," entered into as of May 15, 1990 by and between IMCO Recycling Inc., a Delaware Corporation, the "Grantor," and American National Bank and Trust Company of Sapulpa, Oklahoma, a national bank, the "Trustee."

WHEREAS, the United States Environmental Protection Agency, "EPA," an agency of the United States Government, has established certain regulations applicable to the Grantor, requiring that an owner or operator of an injection well shall provide assurance that funds will be available when needed for plugging and abandonment of the injection well, and

WHEREAS, the Grantor has elected to obtain a letter of credit and establish a standby trust to provide all or part of such financial assurance for the facility identified herein, and

WHEREAS, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this Agreement, and the Trustee is willing to act as trustee,

NOW THEREFORE, the Grantor and the Trustee agree as follows:

Section 1. Definitions. As used in this Agreement:

- (a) The term "Grantor" means the owner or operator who enters into this Agreement and any successors or assigns of the Grantor.
- (b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.
- (c) "Facility" or "activity" means any underground injection well or any other facility or activity that is subject to regulation under the Underground Injection Control Program.
- Section 2. Identification of Facilities and Cost Estimates. This Agreement pertains to the facilities and cost estimates identified in Schedule A (attached). (Schedule A lists, for each facility, the EPA identification number, name, address, and the current plugging and abandonment cost estimate, or portions thereof, for which financial assurance is demonstrated.)

- Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a trust fund, the "Fund," for the benefit of EPA. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule B attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by EPA.
- Section 4. Payment for Plugging and Abandonment. The Trustee shall make payments from the Fund as the EPA Regional Administrator shall direct, in writing, to provide for the payment of the costs of plugging and abandonment of the injection wells covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the EPA Regional Administrator from the Fund for plugging and abandonment expenditures in such amounts as the EPA Regional Administrator shall direct in writing. In addition, the Trustee shall refund to the Grantor such amounts as the EPA Regional Administrator specifies in writing. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.
- Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee.
- Section 6. Trustee Management. The Trustee shall invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of the Section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his duties with respect to the trust fund solely in the interest of the beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing, which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with the aims, except that:
- (a) Securities or other obligations of the Grantor, or any other owner or operator of the facilities, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 15 USC 80a-2.(a), shall not be acquired or held, unless they are securities or other obligations of the Federal or a State government;

- (b) The Trustee is authorized to invest the Fund in time or demand deposits of the Trustee, to the extent insured by an agency of the Federal or State government; and
- (c) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

<u>Section 7. Commingling and Investment.</u> The Trustee is expressly authorized in its discretion:

- (a) To transfer from time to time any or all of the assets of the Fund to any common, commingled, or collective trust fund created by the Trustee in which the fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and
- (b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 et seq., including one which may be created, managed, underwritten, or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.
- <u>Section 8.</u> Express Powers of Trustee. Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered.
- (a) To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;
- (b) To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;
- (c) To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;

- (d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and
- (e) To compromise or otherwise adjust all claims in favor of or against the Fund.
- Section 9. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for the legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of the Trustee, shall be paid from the Fund.
- Section 10. Annual Valuation. Commencing after initial funding of the trust, the Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the appropriate EPA Regional Administrator a statement confirming the value of the Trust. Any securities in the Fund shall be valued at the market value as of no more than 60 days prior to the anniversary date of establishment of the Fund. The failure of the Grantor to object in writing to the Trustee within 90 days after the statement has been furnished to the Grantor and the EPA Regional Administrator shall constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.
- Section 11. Advice of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected, to the extent permitted by law, in acting upon the advice of counsel.
- <u>Section 12.</u> <u>Trustee Compensation.</u> The Trustee shall be entitled to reasonable compensation for its services as agreed upon in writing from time to time with the Grantor.
- Section 13. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment

of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the EPA Regional Administrator, and the present Trustee by certified mail 10 days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 9.

Section 14. Instructions to the Trustee. All orders, requests, and instruction by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A, or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the EPA Regional Administrator to the Trustee shall be in writing, signed by the EPA Regional Administrator of the Regions in which the facilities are located, or their designees, and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests, and instructions. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or EPA hereunder has occurred. Trustee shall have no duty to act in the absence of such orders, requests, and instructions from the Grantor and/or EPA, except as provided for herein.

Section 15. Amendment of Agreement. This Agreement may be amended by an instrument in writing executed by the Grantor, the Trustee, and the appropriate EPA Regional Administrator, or by the Trustee and the appropriate EPA Regional Administrator if the Grantor ceases to exist.

Section 16. Irrevocability and Termination. Subject to the right of the parties to amend this Agreement as provided in Section 15, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor, the Trustee, and the EPA Regional Administrator, or by the Trustee and the EPA Regional Administrator if the Grantor ceases to exist. Upon termination of the Trust, all remaining trust property less final trust administration expenses, shall be delivered to the Grantor.

Section 17. Immunity and Indemnification. The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the EPA Regional Administrator issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor or by the Trust Fund, or both from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

Section 18. Choice of Law. This Agreement shall be administered, construed, and enforced according to the laws of the State of Oklahoma.

Section 19. Interpretation. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each Section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

IN WITNESS WHEREOF, the parties below have caused this Agreement to be executed by their respective officers duly authorized and the corporate seals to be hereunto affixed and attested as of the date first above written.

IMCO Recycling Inc.

Ralph L. Eheek, President and Chief Executive Officer

Attest: Paul V. Dufour

Sr. Vice Presedent

(SEAU)

American National Bank and Trust Company

Guy L. Berry, III, President and

Chief Operations Officer

(SEAL)

CERTIFICATE OF ACKNOWLEDGMENT

FOR

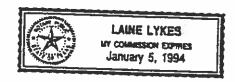
STANDBY TRUST FUND AGREEMENT

STATE OF TEXAS
COUNTY OF DALLAS

On this 15th day of May, 1990, before me personally came Ralph L. Cheek to me known, who, being by me duly sworn, did depose and say that he resides at 602 Durango Circle North, Irving, Texas 75062, that he is President and Chief Executive Officer of IMCO Recycling Inc., the corporation described in and which executed the above instrument; that he knows the seal of said corporation; that the seal affixed to such instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said corporation, and that he signed his name thereto by like order.

(Notáry Public)

(Seal)



SCHEDULE A

Identification of Facilities and Cost Estimates

Schedule A is referenced in the trust agreement dated May 15, 1990 by and between IMCO Recycling Inc., the "Grantor," and American National Bank and Trust Company the "Trustee."

EPA identification number

Name of facility

Address of facility

Current plugging and abandonment cost estimate

Date of estimate

KYI0429

IMCO Recycling Inc.

609 Gardner Camp Road, Highway 1468, Morgantown, KY 42261

\$10,000.00

May 2, 1990

SCHEDULE B

IDENTIFICATION OF FUND

Schedule B is referenced in the Standby Trust Agreement date May 15, 1990 by and between IMCO Recycling Inc. the "Grantor" and American National Bank and Trust Company the "Trustee."

The Fund consist of: (check one and provide identification number)

- (X) Irrevocable Letter of Credit No. 523
- () Surety Performance Bond No.
- () Other (describe)

ATTACHMENT S NOT APPLICABLE

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ATTACHMENT T EXISTING PERMITS

No permits or construction approvals are held for the IMCO Morgantown plant under Resource Conservation and Recovery Act (RCRA), Safe Drinking Water Act (SDWA), Clean Water Act (CWA), Clean Air Act (CAA) and Marine Protection Research and Sanctuaries Act.

IMCO Recycling Inc. has the following permits from the Kentucky Department for Environmental Protection:

- 1) Solid Waste Disposal Facility, Permit No: 016.04. This facility is about 600 feet southwest of the IMCO injection well.
- 2) Construction Permits from the Division of Air Quality, Permit Nos: C-89-014 and C-90-131.
- 3) IMCO Recycling Inc. has filed for NPDES permit with Kentucky Department for Environmental Protection.

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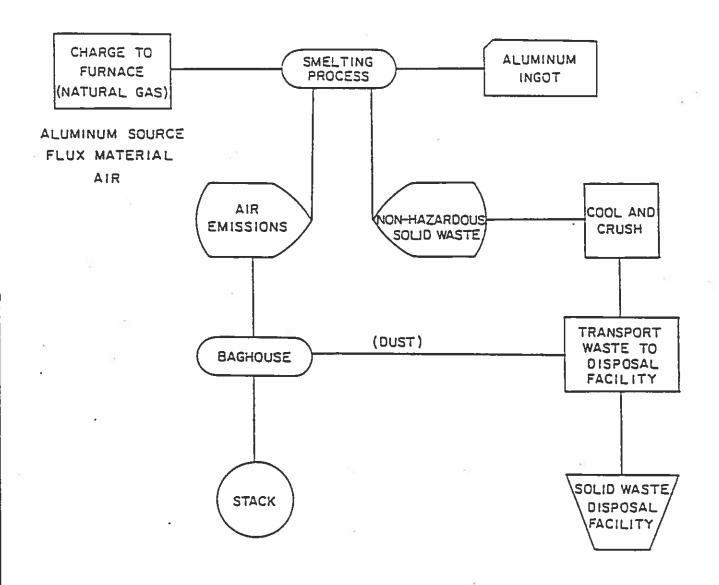
ATTACHMENT U NATURE OF BUSINESS

IMCO Recycling Inc. Morgantown Plant is a secondary aluminum smelter plant. The plant consists of six rotary furnaces, six burners and associated air pollution control equipment. Figure U-1 shows schematically the process diagram of the facility.

During the smelting process, the various types of scrap are charged to the furnace and melted. The "melt" is then covered with a salt flux (NaCl, KCl or MgCl2) to reduce oxidation during scrap melting. As metal ingots or anodes are cast from the melt, the fluxing salts and non-metal contaminants from the scrap and dross remain in the furnace as solid waste. The slag (solid waste) is removed from the furnace and allowed to cool. After cooling, the slag is crushed and transported to the on-site non-hazardous solid waste disposal landfill.

The salt water leachate (brine) from the landfill and the contaminated runoff water from the plant site are injected into the on-site injection well.

FLOW CHART OF PLANT OPERATIONS IMCO RECYCLING, INC. MORGANTOWN KENTUCKY



A. & M. ENGINEERING AND ENVIRONMENTAL SERVICES, INC. TULSA, OKLAHOMA

SCALE	DATE .	FIGURE	U-I
APPROVED BY	DRAWN BY	DRAWING	NO.

REFERENCES

- Gildersleeve, B., 1972, Geologic map of the Morgantown quadrangle, Butler and Warren Counties, Kentucky: U.S. Geol. Surv. Geol. Quad. Map GQ-1040.
- Hopkins, H.T., 1966, Fresh saline water interface map of Kentucky: Kentucky Geol. Surv., Series X, Scale 1:500,000.
- Maxwell, B.W., and Devaul, R.W., 1962, Reconnaissance of groundwater resources in the Western Coal Field Region, Kentucky: U.S. Geol. Surv. Water-Supply paper 1599, 34 p.
- Schwalb, H.R., 1975, Oil and gas in Butler County, Kentucky: Kentucky Geol. Survey, Series X, Report of Investigation 16, 65 p.
- Townsend, M.A., and Cordiviola, S., 1982, Evaluation of selected geologic units for potential use in underground storage of waste: Kentucky Geol. Survey.
- Warner, D.L., and Lehr, J.H., 1981, Subsurface wastewater injection the technology of injecting wastewater into deep wells for disposal: Berkeley, CA., Premier Press, 344 p.



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APPENDIX A

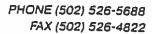
COPIES OF WELL REPORTS

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APPENDIX B

CHEMICAL ANALYSIS REPORT OF SOLID WASTE AND LEACHATE





March 29, 1990

Mr. Altay Ertugrul A & M Engineering 3840 S. 103rd E. Avenue Tulsa, OK 74146

Dear Altay:

The enclosed samples are as follows:

Sample #1: Bag house Dust - Bag house Hopper

Sample #2: Bag house Dust - Bag house Hopper

Sample #3: Bag house Dust - Bag house Hopper

Sample #4: Bag house Dust - Bin 2

Sample #5: Bag house Dust - Bin 2

Sample #6: Bag house Dust - Bin 2

Sample #7: Salt Cake - Bin 15

Sample #8: Salt Cake - Bin 15 Outside

Sample #9: Salt Cake - Mud Building U. C.

Sample #10: Salt Cake - Mud Building - Crushed

Sample #11: Salt Cake - Mud Building - Crushed

Sample #12: Salt Cake - Mud Building - Crushed

La

T.ee



3840 S. 103RD E. AVENUE TULSA, OK 74146

ENGINEERING - ENVIRONMENTAL - CONSTRUCTION (918) 665-6575

	_														
Reimquelted by: [Lynamyl	Polinaminal by: 11-mound	W. II.								- 3/203 *	PATE THE COMP.		SAMPLERS: ILpoure!	1175 Imco	
Date / Time Recognition of Laboratory by:	Date / Time Arcaned by: Haras	Date / Time Record by: Direct	::2 #4		-2.5				7	SAMPLE #3 and # 6	BTATION LDCATION			O KENTUCKY	5
30/har 10 5,30/h	Relinquished by: (Special)	Reinfourthed by: Expressed							e	90	(15 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)		OF THE PARTY OF	160 kg	CHAIN OF CUSTODY RECORD
Rush ASAP.	Dote / Time Received by: Dyname!	Date / Time Received by: Gameser/		•					RusH !!	Rus#!		REMARKS			



6825 East 38th Street Tulsa, Oklahoma 74145 (918) 664-7767

TO:

A & M Engineering Svc., Inc.

MLTS #: 90-1977-1 Date: 04/05/90

3840 S. 103rd E. Ave.

Tulsa, OK 74146

Date Sample Rec'd: 03/30/90

Attn:

Altay Ertugrul

Sample Description: Composite of sample 3 and 6, IMCO Kentucky

EP-TOXICITY TEST

<u>Parameter</u>	Result*	Analyst	MCL(mg/l)
Arsenic	<0.001	sc	5.0
Barium	0.80	Md	100.0
Cadmium	0.23	DM	1.0
Chromium	0.09	DM	5.00
Lead	0.50	DM	5.00
Hercury	0.0004	sc	0.20
Selenium	<0.001	sc	1.0
Silver	0.02	DM	5.0

*In mg/l in the extract

MCL: Maximum Concentration Limit

OTHER

Flashpoint (degrees F) = NA pH (Std.) of 10% Aqueous Extract = NA

REACTIVITY

Cyanide (mg/l) = NA Sulfide (mg/l) = NA

Should you have any questions, please call.

Very truly yours,

METLAB TESTING SERVICES, INC.

Tony Mummolo, Supervisor

Inorganic Environmental Dept.



MLTS 90-1977-1

TABLE I

Volatile Organics on Composite #3 and #6

ANALYST: SDW DATE ANALYZED: 04/04 METHOD 8240-GC/MS VOLATILES

СОМРОИНО	RESULT	СОМРОИНО	RESULT
Acetone	ND	Cis-1,3-dichloropropylene	ND
Acrolein	מא	Trans-1,3-dichloropropylen	e ND
Acrylonitrile	ИD	Ethylbenzene	ИÐ
Benzene	ND	Fluorotrichloromethane	ND
Bis (chloromethyl) ether	ND	2-hexanone	ND
Bromodicholromethane	ND	Methylene chloride	ND
Bromoform	ND	Methy-isobuytl-ketone	ИÐ
Bromomethane	ND	Methy-ethyl-ketone	ND
Carbon disulfide	250	Paraldehyde	ND
Carbon tetrachloride	ND	Styrene	ND
Chlorobnezene	ND	1,1,2,2-tetrachloroethane	ND
Chlorodibromomethene	מא	Tetrachloroethylene	ND
Chloroethane	ND	Tolene	ND
2-chloroethylvinyl ether	ND	1,1,1-trichloroethane	ND
Chloroform	ND	1,1,2-trichloroethane	ND
Chloromethane	ND	Trichloroethylene	ND
Dichlorodifluoromethane	ND	Vinyl acetate	ND
1,1-dichloroethane	מא	Vinyl chloride	ND
1,2-dichloroethane	ND	O-xylene	ND
1,1-dichloroethylene	ND	-M-xylene	ND
1,2-trans-dichloroethylene	ND	P-xylene	ND

All results reported in PPB unless otherwise specified ND = not detected at detection limit 50 PPB

SURROGATE RECOVERIES (2)

1,2 dichloroethane-D4 96
Toluene-D8 104
Bromofluorobenzene 99

Approved by_

Tony Hymmolo, Supervisor

Inorganic Environmental Department

pd



MLTS 90-1977-A

TABLE IA

Additional Analysis on Composite of #3 and #6 IMCO, Kentucky

<u>Paarameter</u>	Result	Method	Date/Time	Analyst
Chloride (20% Water Extract)	•		£3	
mg/kg	272, 965	EPA 330.5	04/05 8:1	5 KA
Chemical Oxygen Demand: NA			. –	
Total Dissolved Solids: NA				
Total Organic Carbon: NA				47
Specific Conductance: NA		FF		
pH (Std) 20% Water Extract =	8.31	EPA 150.1	04/05 8:3	0 ка
Total Iron (mg/kg)	1379	EPA 236.1	04/05 8:3	
Total Sodium (mg/kg)	66196	EPA 273.1		
Total Organic Halides: NA			04/05 8:3	
Total Arsenic (mg/kg)	2.50	EPA 206.3	04/04 3:0	
Total Barium (mg/kg)	72.5	EPA 208.1		•
Total Cadmium (mg/kg)	11.7	EPA 213.1		
Total Chromium (mg/kg)	55.9	EPA 218.1		
Total Lead (mg/kg)	50.7	EPA 239.1		
Total Mercury (mg/kg)	0.022	EPA 245.1	04/05 8:0	
Nitrate (20% Water Extract)			04703 0.0	8 JC 1
(mg/kg)	NA			AM
Total Selemium (mg/kg)	<0.025	EPA 270.3	04/04 3:0	
Total Silver (mg/kg)	1.25	EPA 272.1	04/05 8:30	
,g,g,		HER ZIZ.I	0:30 CB/EB	9 DM

* NA = Not Applicable

Approved by_

Tony Mymmolo, Supervisor

Inorganic Environmental Department

pd

METLAB Testing Services, Inc.

6825 East 38th Street Tulsa, Oklahoma 74145 (918) 664-7767

TO:

A & M Engineering

MLTS #: 90-1977-2

Date: 04/05/90

Date Sample Rec'd: 03/30/90

Attn:

Altay Ertugrul

Sample Description:

Composite of samples 7 & 9, IMCO (#9 MBI)

Kentucky (#7 Bin 15)

EP-TOXICITY TEST

<u>Parameter</u>	Result*	<u>Analyst</u>	MCL(mg/l)
Arsenic	0.001	sc	5.0
Barium	2.80	MD	100.0
Cadmium	0.08	MU	1.0
Chromium	0.09	DM	5.00
Lead	0.38	DM	5.00
Mercury	0.0003	sc	0.20
Selenium	0.02	sc	1.0
Silver	0.03	DM	5.0

*In mg/l in the extract

MCL: Maximum Concentration Limit

OTHER

Flashpoint (degrees F) = NA pH (Std.) of 10% Aqueous Extract = NA

REACTIVITY

Cyanide (mg/l) = NA Sulfide (mg/l) = NA

Should you have any questions, please call.

Very truly yours,

METLAB TESTING SERVICES, INC.

Tony Mummolo, Supervisor

Inorganic Environmental Dept.

Specialists in chemical analysis, metallurgical and environmental control testing





MLTS 90-1977-2

TABLE I

Volatile Organics on Composite #7 and #9

ANALYST: SDW DATE ANALYZED: 04/04 - METHOD 8240-GC/MS VOLATILES

COMPOUND	RESULT	СОМРОИИО	RESULT
Acetone Acrolein Acrylonitrile Benzene Bis (chloromethyl) ether Bromodicholromethane Bromoform Bromomethane Carbon disulfide Carbon tetrachloride Chlorodibromomethene Chloroethane 2-chloroethylvinyl ether Chloroform Chloromethane Dichlorodifluoromethane	RESULT ND ND ND ND ND ND ND ND ND ND ND ND ND	COMPOUND Cis-1,3-dichloropropylene Trans-1,3-dichloropropyle Ethylbenzene Fluorotrichloromethane 2-hexanone Methylene chloride Methy-isobuytl-ketone Methy-ethyl-ketone Paraldehyde Styrene 1,1,2,2-tetrachloroethane Tetrachloroethylene Tolene 1,1,1-trichloroethane 1,1,2-trichloroethane Trichloroethylene Vinyl acetate	ND ND ND ND ND ND ND ND ND ND ND ND ND
1,1-dichloroethane	מא	Vinyl chloride	ND
1,2-dichloroethane 1,1-dichloroethylene	DИ D	O-xylene M-xylene	ND ND
1,2-trans-dichloroethylene		P-xylene	ממ

All results reported in <u>PPB</u> unless otherwise specified ND = not detected at detection limit 50 PPB

SURROGATE RECOVERIES (%)

1,2 dichloroethane-D4 102 Toluene-D8 110 Bromofluorobenzene 92

Approved by <

Tony Mummolo, Supervisor

Inorganic Environmental Department

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MLTS 90-1977-2A

TABLE IA

Additional Analysis on Composite of #7 and #9 IMCO, Kentucky

Parameter	Result	<u>Method</u>	Date/Time	Analyst
Chloride (20% Water Extract)	8		8 e	
mg/kg	207, 383	EPA 330.5	04/05 8:30	KA
Chemical Oxygen Demand: NA				
Total Dissolved Solids: NA				
Total Organic Carbon: NA				
Specific Conductance: NA		=	4. *	
pH (Std) 20% Water Extract =	9.93	EPA 150.1	04/05 8:30	KA
Total Iron (mg/kg)	1008	EPA 236.1	04/05 8:30	KA
Total Sodium (mg/kg)	74024	EPA 273.1	04/05 8:30	KA
Total Organic Halides: NA	283 ¹³			
Total Arsenic (mg/kg)	0.175	EPA 206.3	04/04 3:00	SC
Total Barium (mg/kg)	100	EPA 208.1		DH
Total Cadmium (mg/kg)	3.13	EPA 213.1		
Total Chromium (mg/kg)	53.5	EPA 218.1		
Total Lead (mg/kg)	37.3	EPA 239.1		
Total Mercury (mg/kg)	0.004	EPA 245.1	04/05 8:00	SC
Nitrate (20% Water Extract)	0.001			
(mg/kg)	NA		*0 E	AH
Total Selemium (mg/kg)	<0.025	EPA 270.3	04/04 3:00	
	1.25	EPA 270.3	04/05 8:30	DM
Total Silver (mg/kg)	1.43	DER 212.1	64/67 0:26	DM

* NA = Not Applicable

Approved by

Tony Mummolo, Supervisor

Inorganic Environmental Department

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SOUTHWEST LABORATORY OF OKLAHOMA, INC.

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

A&M ENGINEERING & ENVIRONMENTAL SERVICES CLIENT:

REFORT: 2786.01MT

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 06-28-90

TULSA, OKLAHOMA 74146 ATTM: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN

SWLO # 2786.01

DATE SUBMITTED: 06-08-90

PROJECT: 1175; IMCO REC C ING INC.: KENTUCKY SAMPLE ID: E #10 SALTCAKE

FARAMETER	DET. LIMIT	UNIT	RESULTS	DATE ANALYZED	METHOD REFERENCE
EP TOXICITY METALS	•				
ARSENIC BARIUM CADMIUM CHROMIUM LEAD MERCURY VER LENIUM	0.035 0.02 0.005 0.005 0.05 0.002 0.01	mg/L mg/L mg/L mg/L mg/L mg/L mg/L	ND 0.74 ND 0.14 ND ND ND ND	06-20-90 06-20-90 06-20-90 06-20-90 06-23-90 06-20-90 06-20-90	SW 6010 SW 6010 SW 6010 SW 6010 SW 7471 SW 6010 SW 6010

ND = NOT DETECTED ABOVE LIMIT OF QUANTITATION

SW = EPA METHOD REFERENCES, "SW846"

SOUTHWEST LABORATORY OF OKLAHOMA, INC.

1700 W. Albany - Suite "C" - Broken Arrow, Oklahoma 74012 - 918-251-2858

CLIENT: A&M ENGINEERING & ENVIRONMENTAL SERVICES

REPORT: 2786.01EP

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 07-09-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN, TCLP EXTRACTION

SWLO # 2786.01

DATE SUBMITTED: 06-08-90

DATE EXTRACTED: 06-20-90 DATE ANALYZED: 07-02-90

PROJECT: 1175; IMCO RECYCLING INC.; KENTUCKY

METHOD REFERENCE: SW846-8080, EPA METHODOLOGY

SAMPLE ID: SAMPLE #10 SALTCAKE

RESULTS REPORTED IN ug/L OR Parts Per Billion (PPB)

PESTICIDES/PCB'S	DETECTION LIMIT	RESULTS
GAMMA-BHC	80	ND
ENDRIN	4.0	ND
METHOXYCHLOR	2000	ND
TOXAPHENE	100	ФИ

QA/QC SURROGATE RECOVERIES

DIBUTYLCHLORENDATE (24-154) 103%

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF GC LIMITS

SOUTHWEST LABORATORY OF OKLAHOMA, INC.

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

CLIENT: A&M ENGINEERING & ENVIRONMENTAL SERVICES

REPORT: 2786.01VT

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 06-28-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN, TCLP EXTRACTION

SWL0 # 2786.01

DATE SUBMITTED: 06-08-90

PROJECT: 1175; IMCO RECYCLING INC.; KEN

SAMPLE ID: SAMPLE #10 SALTCAKE

PARAMETER	DET. LIMIT	UNIT	RESULTS	DATE ANALYZED	METHOD REFERENCE
TCLP VOLATILES BENZENE CARBON TETRA CHLORIDE CHLOROBENZENE CHLOROFORM 1,2-DICHLOROETHANE 1,1-DICHLOROETHENE TETRACHLOROETHENE TRICHLOROETHENE VINYL CHLORIDE	555555550	ug/L ug/L ug/L ug/L ug/L ug/L ug/L	22222222222222222222222222222222222222	06-18-90 06-18-90 06-18-90 06-18-90 06-18-90 06-18-90 06-18-90 06-18-90	SW 8240 SW 8240 SW 8240 SW 8240 SW 8240 SW 8240 SW 8240 SW 8240 SW 8240

QA/QC SURROGATE RECOVERIES

TOLUENE-d8(81-117) 98% BROMOFLUOROBENZENE(74-121) 109% 1,2-DICHLOROETHANE-d4(70-121) 93%

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF GUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF QC LIMITS

SW = EFA METHODOLOGY "#SW846", THIRD EDITION

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

A&M ENGINEERING & ENVIRONMENTAL SERVICES. CLIENT:

REPORT: 2786.018

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 07-10-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN, TCLP EXTRACTION

SWL0 # 2786.01

DATE SUBMITTED: 06-08-90 DATE EXTRACTED: 06-20-90 DATE ANALYZED: 07-05-90

METHOD REFERENCE: SW846-8270, EPA METHODOLOGY

SAMPLE ID: SAMPLE #10 SALTCAKE

RESULTS REPORT IN ug/L OR Parts Per Billion (PPB)

DET.

TCLP SEMIVOLATILES	LIMIT	RESULTS
TOUR SCHILLS		
O-CRESOL M-CRESOL P-CRESOL TOTAL CRESOL'S** 1,4-DICHLOROBENZENE 2,4-DINITROTOLUENE HEXACHLOROBENZENE PENTACHLOROPHENOL 2,4,5-TRICHLOROPHENOL 2,4,6-TRICHLORPHENOL HEXACHLOROBUTADIENE HEXACHLOROBUTADIENE NITROBENZENE	20 20 20 20 20 20 20 20 20 20 20 20 20	20 20 20 20 20 20 20 20 20 20 20 20 20 2
PYRIDINE	_,	
	BA/BC SURROGATE RECOVERIES	

NITEOBENZENE-45	5(35-114)	52%	2-FLUOROBIPHENY	L(43-116)	62%	TERPHENYL-d14	(33-141)
MILKODEMEETE OF	. (0 0 - 1 - 1)	T		(01 100)	4 77 24 4	2 4 4-TETBERMREHENRI	(10-125)
PHENOL-d5	(10-94)	20%	2-FLUORUPHENUL	(21-100)	1244	2,4,6-TRIBROMOPHENOL	.(10 110)

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF QC LIMITS

** = COMBINATIONS OF O, M, AND P CRESOLS

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

CLIENT: A&M ENGINEERING & ENVIRONMENTAL SERVICES

REPORT: 2786.02MT

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 06-28-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN

SWLO # 2786.02

DATE SUBMITTED: 06-08-90

PROJECT: 1175; IMCO RECYCLING INC.; KENTUCKY

SAMPLE ID: SAMPLE #2 8 #4

PARAMETER	DET. LIMIT	UNIT	RESULTS	DATE ANALYZED	METHOD REFERENCE
EF FOXICITY METALS	•				
ARSENIC BARIUM CADMIUM CHROMIUM LEAD MERCURY LVER LVER	0.035 0.02 0.005 0.005 0.05 0.0002 0.01	ma/L mg/L mg/L mg/L mg/L mg/L mg/L	ND 0.20 0.026 ND ND ND ND ND	06-20-90 06-20-90 06-20-90 06-20-90 06-20-90 06-23-90 06-20-90	SW 6010 SW 6010 SW 6010 SW 6010 SW 7471 SW 6010 SW 6010

NO = NOT DETECTED ABOVE LIMIT OF QUANTITATION

SW = EPA METHOD REFERENCES, "SW846"

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

CLIENT: A&M ENGINEERING & ENVIRONMENTAL SERVICES

REPORT: 2786.02EP

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 07-09-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN, TCLP EXTRACTION

SWLO # 2786.02

DATE SUBMITTED: 06-08-90

DATE EXTRACTED: 06-20-90 DATE ANALYZED: 07-03-90

PROJECT: 1175; IMCO RECYCLING INC.; KENTUCKY

METHOD REFERENCE: SW846-8080, EPA METHODOLOGY

SAMPLE ID: SAMPLE #2 & #4

RESULTS REPORTED IN ug/L OR Farts Per Billion (FPB)

PESTICIDES/PCB'S	DETECTION LINIT	RESULTS
GAMMA-BHC ENDRIN METHOXYCHLOR	8 .4 200	MD MD MD
TOXAPHENE	10	ND

QA/QC SURROGATE RECOVERIES

DIBUTYLCHLORENDATE (24-154) 122%

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF QC LIMITS

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

CLIENT: A&M ENGINEERING & ENVIRONMENTAL SERVICES

REPORT: 2786.02VT

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 06-28-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN, TCLP EXTRACTION

SWL0 # 2786.02

DATE SUBMITTED: 06-08-90

PROJECT: 1175; IMCO RECYCLING INC.; KENTUCKY

SAMPLE ID: SAMPLE #2 & #4

PARAMETER	DET. LIMIT	UNIT	RESULTS	DATE ANALYZED	METHOD REFERENCE
TCLP VOLATILES					
BENZENE	5	ug/L	ND	06-18-90	SW 8240
CARBON TETRA CHLORIDE	5	ug/L	ND	06-18-90	SW 8240
CHLOROBENZENE	5	ug/L	ND	06-18-90	SW 8240
CHLOROFORM	5	ug/L	ND	06-18-90	SW 8240
	5	ug/L	ND	06-18-90	SW 8240
1,2-DICHLOROETHANE	5	ug/L	ND	06-18-90	SW 8240
1,1-DICHLORGETHENE	5	ug/L	ND	06-18-90	SW 8240
TETRACHLOROETHENE	5	ug/L	ND	06-18-90	SW 8240
TRICHLOROETHENE VINYL CHLORIDE	10	ug/L	ND	06-18-90	SW 8240

GA/GC SURROGATE RECOVERIES

TOLUENE-d8(81-117) 95% BROMOFLUOROBENZENE(74-121) 102% 1,2-DICHLOROETHANE-d4(70-121) 90%

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF GC LIMITS SW = EPA METHODOLOGY "#SW846", THIRD EDITION

1700 W. Albany . Suite "C" . Broken Arrow. Oklahoma 74012 . 918-251-2858

CLIENT:

A&M ENGINEERING & ENVIRONMENTAL SERVICES

REPORT: 2786.028

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 07-10-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN, TCLP EXTRACTION

SWLD # 2786.02

DATE SUBMITTED: 06-08-90 06-20-90 DATE EXTRACTED: DATE ANALYZED: 07-05-90

METHOD REFERENCE: SW846-8270, EPA METHODOLOGY

SAMPLE ID: SAMPLE #2 & #4

RESULTS REPORT IN ug/L OR Parts Per Billion (PPB)

TCLP SEMIVOLATILES	DET. LIMIT	RESULTS
0.00000	20	ND
O-CRESOL	20	ND
M-CRESOL	20	ND
P-CRESOL	20	ND
TOTAL CRESOL'S**	20	ND
1,4-DICHLOROBENZENE	20	ND
2,4-DINITROTOLUENE	20	ND
HEXACHLOROBENZENE	20	ND
PENTACHLOROPHENÖL	20	ND
2,4,5-TRICHLOROPHENOL	20	ND
2,4,6-TRICHLORPHENOL	20	ND
HEXACHLOROBUTADIENE	20	ND
HEXACHLOROETHANE	20	ND
NITROBENZENÉ PYRIDINE	20	ND

QA/QC SURROGATE RECOVERIES

NITROBENZENE-d5(35-114)	58%	2-FLUOROBIPHENYL(43-116)	56%	TERPHENYL-d14 (33-141)
PHENOL-d5 (10-94)	78%	2-FLUOROPHENOL (21-100)	62%	2,4,6-TRIBROMOPHENOL(10-123)

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF QC LIMITS

** = COMBINATIONS OF 0, M, AND P CRESOLS

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

A&M ENGINEERING & ENVIRONMENTAL SERVICES CLIENT:

63005 REPORT:

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 07-09-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN

SWLO # METHOD BLANK

DATE EXTRACTED: 06-20-90

DATE ANALYZED : 07-02-90

PROJECT: 1175; IMCO RECYCLING INC.; KENTUCKY METHOD REFERENCE: SW846-8080, EPA METHODOLOGY

SAMPLE ID: METHOD BLANK

RESULTS REPORTED IN ug/L OR Parts Per Billion (PPB)

PESTICIDES/PCB'S	DETECTION LIMIT	RESULTS
GAMMA-BHC	4.0	ND
ENDRIN	0.2	ND ND
METHOXYCHLOR TOXAPHENE	5.0	ND

QA/QC SURROGATE RECOVERIES

DIBUTYLCHLORENDATE (24-154) 140%

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF QC LIMITS

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

CLIENT: A&M ENGINEERING & ENVIRONMENTAL SERVICES

REPORT: G3005.2

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 07-09-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN
SWLO # TCLP EXTRACTION BLANK
DATE EXTRACTED: 06-20-90
DATE ANALYZED: 07-02-90

PROJECT: 1175; IMCO RECYCLING INC.; KENTUCKY

METHOD REFERENCE: SW846-8080, EPA METHODOLOGY

SAMPLE ID: TCLP BLANK

RESULTS REPORTED IN ug/L OR Parts Per Billion (PPB)

PESTICIDES/PCB'S	DETECTION LIMIT	RESULTS
GAMMA-BHC ENDRIN METHOXYCHLOR	20.0 1.0 500 25.0	ND ND ND
TOXAPHENE	2000	

QA/QC SURROGATE RECOVERIES

DIBUTYLCHLORENDATE (24-154) 142%

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF QC LIMITS

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

CLIENT:

A&M ENGINEERING & ENVIRONMENTAL SERVICES

REPORT: G3005.3

3840 SOUTH 103RD EAST AVENUE, SUITE 227

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

DATE: 06-28-90

SAMPLE MATRIX: UNKNOWN, TCLP EXTRACTION

SWLO # METHOD BLANK

PROJECT: 1175; IMCO RECYCLING INC.; KENTUCKY

SAMPLE ID: METHOD BLANK

PARAMETER	DET. LIMIT	UNIT	RESULTS	DATE ANALYZED	METHOD REFERENCE
TCLP VOLATILES					
BENZENE	5	ug/L	ND	06-18-90	SW 8240
CARBON TETRA CHLORIDE	5	ug/L	ND	06-18-90	SW 8240
CHLOROBENZENE	5	ug/L	ND	06-18-90	SW 8240
CHLOROFORM	5	ug/L	ND	06-18-90	SW 8240
1,2-DICHLOROETHANE	5	ug/L	ND	06-18-90	SW 8240
1,1-DICHLOROETHENE	5	ug/L	ND	06-18-90	SW 8240
TETRACHLOROETHENE	5	ug/L	ND	06-18-90	SW 8240
RICHLOROETHENE	5	ug/L	ND	06-18-90	SW 8240
VINYL CHLORIDE	10	ug/L	ND	06-18-90	SW 8240

QA/QC_SURROGATE RECOVERIES

TOLUENE-d8(81-117)	107%
BROMOFLUOROBENZENE(74-121)	108%
1.2-DICHLORGETHANE-d4(70-121)	97%

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

= ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF GC LIMITS

SW = EPA METHODOLOGY "#SW846", THIRD EDITION

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

CLIENT: A&M ENGINEERING & ENVIRONMENTAL SERVICES

3840 SOUTH 103RD EAST AVENUE, SUITE 227

REPORT: G3005.4

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

DATE: 06-28-90

SAMPLE MATRIX: UNKNOWN, TCLP EXTRACTION

SWLO # TCLP EXTRACTION BLANK

PROJECT: 1175; IMCO RECYCLING INC.; KENTUCKY

SAMPLE ID: TCLP BLANK

PARAMETER TCLP VOLATILES	DET. LIMIT	UNIT	RESULTS	DATE ANALYZED	METHOD REFERENCE
BENZENE CARBON TETRA CHLORIDE CHLOROBENZENE CHLOROFORM 1,2-DICHLOROETHANE 1,1-DICHLOROETHENE TETRACHLOROETHENE RICHLOROETHENE INYL CHLORIDE	5 5 5 5 5 5 5 5 5 5 5	ug/L ug/L ug/L ug/L ug/L ug/L ug/L	00 00 00 00 00 00 00 00	06-18-90 06-18-90 06-18-90 06-18-90 06-18-90 06-18-90 06-18-90 06-18-90	SW 8240 SW 8240 SW 8240 SW 8240 SW 8240 SW 8240 SW 8240 SW 8240 SW 8240

QA/QC SURROGATE RECOVERIES

TOLUENE-d8(81-117)	100%
BROMOFLUGROBENZENE(74-121)	101%
1,2-DICHLOROETHANE-d4(70-121)	92%

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF QC LIMITS

SW = EPA METHODOLOGY "#SW846", THIRD EDITION

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

CLIENT:

A&M ENGINEERING & ENVIRONMENTAL SERVICES.

REPORT: 63005.5

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 07-10-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN, TCLP EXTRACTION

SWLO # METHOD BLANK

DATE EXTRACTED: 06-20-90 DATE ANALYZED: 06-29-90

METHOD REFERENCE: SW846-8270, EPA METHODOLOGY

SAMPLE ID: METHOD BLANK

RESULTS REPORT IN ug/L OR Parts Per Billion (PPB)

TCLP SEMIVOLATILES	DET. LIMI	T RESULTS
O-CRESOL M-CRESOL P-CRESOL TOTAL CRESOL'S** 1,4-DICHLOROBENZENE ,4-DINITROTOLUENE EXACHLOROBENZENE PENTACHLOROPHENOL 2,4,5-TRICHLOROPHENOL 2,4,6-TRICHLORPHENOL HEXACHLOROBUTADIENE HEXACHLOROBUTADIENE NITROBENZENE PYRIDINE	10 10 10 10 10 10 10 10 10	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0

QA/QC SURROGATE RECOVERIES

NITROBENZENE-	d5(35-114)	49%	2-FLUOROBIPHENYL(43-116)	49%	TERPHENYL =d+d	(33-141)	
PHENOL-d5	(10-94)	61%	2-FLUOROPHENOL (21-100)	54%	2.4.6-TRIBROMOPHENO	(10-123)	4

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF QC LIMITS

** = COMBINATIONS OF O, M, AND P CRESOLS

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

CLIENT:

A&M ENGINEERING & ENVIRONMENTAL SERVICES:

REPORT: G3005.6

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 07-10-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN, TCLP EXTRACTION

SWLO # TCLP EXTRACTION BLANK DATE EXTRACTED: 06-20-90 DATE ANALYZED: 06-28-90

METHOD REFERENCE: SW846-8270, EPA METHODOLOGY

SAMPLE ID: TCLP BLANK

RESULTS REPORT IN ug/L OR Parts Per Billion (PPB)

TCLP SEMIVOLATILES	DET. LIMIT	RESULTS
O-CRESOL M-CRESOL P-CRESOL TOTAL CRESOL'S** 1,4-DICHLOROBENZENE 3,4-DINITROTOLUENE EXACHLOROBENZENE PENTACHLOROPHENOL 2,4,5-TRICHLOROPHENOL 2,4,6-TRICHLOROPHENOL HEXACHLOROBUTADIENE HEXACHLOROBUTADIENE NITROBENZENE PYRIDINE	50 50 50 50 50 50 50 50 50 50 50	RESULTS ND ND ND ND ND ND ND ND ND N

QA/QC SURROGATE RECOVERIES

NITROBENZENE-	d5(35-114)	56%	2-FLUOROBIPHENY	L(43-116)	62%	TERPHENYL-d14	(33-141)	84
PHENOL-d5	(10-94)	74%	2-FLUOROPHENOL	(21-100)	70%	2,4,6-TRIBROMOPHEN	OL(10-123)	51

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF QC LIMITS

** = COMBINATIONS OF O, M, AND P CRESOLS

1700 W. Albany . Suite "C" . Broken Arrow, Oklahoma 74012 . 918-251-2858

CLIENT:

A&M ENGINEERING & ENVIRONMENTAL SERVICES.

REPORT: G3005.7

3840 SOUTH 103RD EAST AVENUE, SUITE 227

DATE: 07-10-90

TULSA, OKLAHOMA 74146 ATTN: MURRAY R. McCOMAS

SAMPLE MATRIX: UNKNOWN, TCLP EXTRACTION

SWLO # TCLP EXTRACTION BLANK DATE EXTRACTED: 06-20-90 DATE ANALYZED: 06-28-90

METHOD REFERENCE: SW846-8270, EPA METHODOLOGY

SAMPLE ID: TCLP BLANK

RESULTS REPORT IN ug/L OR Parts Per Billion (PPB)

TCLP SEMIVOLATILES	DET. LIMIT	RESULTS
O-CRESOL M-CRESOL P-CRESOL TOTAL CRESOL'S** 1,4-DICHLOROBENZENE ,4-DINITROTOLUENE EXACHLOROBENZENE PENTACHLOROPHENOL 2,4,5-TRICHLOROPHENOL 2,4,6-TRICHLOROPHENOL HEXACHLOROBUTADIENE HEXACHLOROETHANE NITROBENZENE PYRIDINE	50 50 50 50 50 50 50 50 50 50 50	ND ND ND ND ND ND ND ND ND ND ND ND ND N

QA/QC SURROGATE RECOVERIES

NT I KORENZENE-	·d5(35-114)	61%	2-FLUOROBIPHENY	L(43-116)	60%	TERPHENYL-d14 (33-141	x 0	00
PHENOL-d5	(10-94)	76%	2-FLUOROPHENOL	(21-100)	64%	2,4,6-TRIBROMOPHENOL(10-123	<i>i</i>	57

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

* = SURROGATE RECOVERY OUTSIDE OF QC LIMITS

** = COMBINATIONS OF 0, M, AND P CRESOLS

1700 W. ALBANT SULTE C SROKEN ARROW, OK 74012 918 251-2858

Client Name: A & H ENGINEERING & ENVIRONMENTAL SERVICES

3840 SOUTH 103RD EAST AVENUE

SUITE 227

TULSA, OK 74146

Client ID:

LEACHATE

Project ID:

IMCO-KY.

SWLO ID:

3015.07

Report:

3015.07

Collected: Received:

07/02/90 07/03/90

Report Date: Last Modified: 08/01/90

Page:

1 Matrix: Water

	DATE	DATE DETECTION			DATE	METHOD
TEST	EXTRACTED	LIMIT	UNITS	RESULTS	DESTABLA	REFERENCE
		*** INORC	*** 231KA			
ALKALINITY		1	mg/\	88	07/06/90	SM 403/EPA 310.1
ORGANIC CARBON		5.00	mg/l	16	07/30/90	EPA 415.1/SH 505
INORGANIC CHLORIDE		20	mg/l	9,260	07/24/90	EPA 300.0
ORGANIC CHLORIDE		0.01	mg/t	Ю	07/23/90	SW 9020
COO		10	mg/l	40	07/25/90	SM 508A/EPA 410.1
SPEC.GRAVITY				1.010	07/27/90	SM 213E
MITRATE		2	mg/L	MD	07/24/90	EPA 300.0
TOS		1	ing/L	14,215	07/27/90	EPA 160.1
SULFATE		2	ing/(37	07/24/90	EPA 300.0
		*** NE	TALS ***			
ARSENIC		35.0	UG/L	NO	08/01/90	Su 7060
BARIUM		20	UG/L	251	07/26/90	SW 6010
CADMIUN		5.0	UG/L	ND	07/26/90	SW 6010
CHRONIUM		5.0	UG/L	NO	07/26/90	SM 6010
IRON		30	UG/L	51.7	07/26/90	5M 6010
LEAD		20.0	US/L	Ю	08/01/90	SW 7421
MERCURY		0.2	ug/1	ND	07/23/90	SW 7470
SELENIUM		30.0	UG/L	ND	08/01/90	SM 7740
SILVER		10	UG/L	NO	07/26/90	SW 6010
SOCIUM		500	UG/L	2350000	07/25/90	SM 4010

NO - NOT DETECTED ABOVE QUANTITATION LIMIT

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

I - UNABLE TO GUANTITATE DUE TO MATRIX INTERFERENCE

MA - NOT APPLICABLE

odology: SM = STANDARD METHODS, 16th EDITION, 1985

EPA - #EPA600/4-79-020, MARCH 1985

⁻ s SURROGATE RECOVERY OUTSIDE OF QC LIMITS

D . SURROGATES DILUTED OUT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

SW = EPA METHODOLOGY, "#SW846", THIRD EDITION, NOVEMBER 1986

1700 W. ALBANY SUITE C BROKEN ARROW, OK 74012 918 251-2858

Client Name: A & M ENGINEERING & ENVIRONMENTAL SERVICES

3840 SOUTH 103RD EAST AVENUE

SUITE 227

TULSA, OK 74146

Client ID:

LEACHATE POND

Project ID:

IN MET KY.

SWLO ID:

4667.08

Report:

4667.08

Collected: Received:

12/19/90 12/20/90 Report Date: Last Modified: 01/18/91

Page: 1 Matrix: Water

DETECTION DATE METHOD TEST EXTRACTED LIMIT UNITS RESULTS ANALYZED REFERENCE

***	HATAR	BOLIS	WASTE	-

•	** HAZARDO	US WASTE	•		
TCLP EXTRACTION			extract	01/03/91	
24 1	*** INOR	GANICS ***			
ANHOHIA (H)	10	NG/L	137	12/27/90	EPA 350.3/SM 417E
ORGANIC CARBON	5.0	mg/l	nd	01/17/91	EPA 415.1/SM 505
INORGANIC CHLORIDE	0.2	mg/l	2010	12/28/90	EPA 300.0
ORGANIC CHLORIDE	0.01	sg/l	0.14	01/11/91	SW 9020
CONDUCTANCE	NA	umhos/cm	7,100	01/17/91	SH 205
COD	10	mg/l	ND	12/28/90	SH 508A/EPA 410.1
NITRATE	0.2	ng/l	ND	12/28/90	EPA 300.0
pH	NA	S.U.	9.16	12/21/90	EPA 150.1/SH 423
SULFATE	0.2	mg/l	30.5	12/28/90	EPA 300.0
	*** KET	TALS ***			
METALS -ICP					SW6010
ARSENIC	.05	mg/l	ND	01/08/91	340010
BARIUM	.02	mg/l	.11	01/08/91	
CADHIUM	.005	ag/l	ND	01/08/91	
CHROMIUM	.005	mg/t	ND	01/08/91	
LEAD	05	mg/l	ND	01/08/91	
MERCURY	.02	mg/L	ND	01/08/91	
SILVER	.01	ing/l	ND	01/08/91	
SELENIUM	.05	mg/t	KD	01/08/91	
IRON	30	ug/l	182	01/02/91	SW 6010
SCOTUM	500	ug/l	790000	01/02/91	SW 6010
				- 17	

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

B = ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

I - UNABLE TO QUANTITATE DUE TO MATRIX INTERFERENCE

NOT APPLICABLE

iodology: SM = STANDARD METHODS, 16th EDITION, 1985 EPA = #EPA600/4-79-020, MARCH 1985

^{* =} SURROGATE RECOVERY OUTSIDE OF QC LIMITS

D = SURROGATES DILUTED OUT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

SW = EPA METHODOLOGY, "#SW846", THIRD EDITION, NOVEMBER 1986

1700 W. ALBANY SUITE C BROKEN ARROW, OK 74012 918 251-2858

Client Name: A & M ENGINEERING & ENVIRONMENTAL SERVICES

3840 SOUTH 103RD EAST AVENUE

SUITE 227

74146 TULSA, OK

Client ID:

LECHATE POND

Project ID:

IMCO, KY.

SWLO ID:

9883.07

Report:

9883.07

Collected:

NICKEL

06/05/1992

Report Date: 07-01-1992

Page:

Received: 06/08/1992

Last Modified:

Matrix: Water

DATE METHOD DETECTION LIMIT UNITS RESULTS_ ANALYZED REFERENCE EXTRACTED TEST *** INORGANICS *** 06/16/92 EPA 350.3/SM 417E 100 mg/l 450 AMMONIA (N) 06/10/92 EPA 300.0 mg/l 10031 200 INORGANIC CHLORIDE umhos/cm 29000 06/09/92 SM 205 1 CONDUCTANCE 06/09/92 SM 213E 1.01 0.01 SPEC.GRAVITY 7.0 06/09/92 EPA 300.0 0.2 mg/l NITRATE 06/09/92 EPA 300.0 0.2 mg/l NO NITRITE IONCHRO s.u.a25c 9.33 06/09/92 EPA 150.1/SM 423 0.1 ρН 16 06/09/92 EPA 160.2 mg/l 1 TSS *** METALS *** 06/12/92 SW 6010 5.0 ug/l ND CADHIUM 06/12/92 SW 6010 57.5 200 ug/l LEAD SW 6010 06/12/92 ND 100 ug/l MAGNESIUM 06/12/92 SW 6010 ND 100 ug/l

HD = NOT DETECTED ABOVE QUANTITATION LIMIT

= ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

JUNABLE TO QUANTITATE DUE TO MATRIX INTERFERENCE NOT APPLICABLE

Methodology: SM = STANDARD METHODS, 16th EDITION, 1985 EPA = #EPA600/4-79-020, MARCH 1985

* = SURROGATE RECOVERY OUTSIDE OF QC LIMITS

D = SURROGATES DILUTED OUT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

SW = EPA METHODOLOGY, "#SW846", THIRD EDITION, NOVEMBER 1986

1700 W. ALBANY SUITE C BROKEN ARROW, OK 74012 918 251-2858

Client Name: A & M ENGINEERING & ENVIRONMENTAL SERVICES

3840 SOUTH 103RD EAST AVENUE

SUITE 227

TULSA, OK 74146

Client ID:

LEACHATE POND

Project ID: IMCO, KY.

SWLO ID:

10838.08

Report:

10838.08

Received:

Collected: 08/25/1992 08/27/1992

Report Date: 09/16/1992 Last Modified:

Page:

Matrix: Water

TEST	DATE EXTRACTED	DETECTION	UNITS	RESULTS	DATE ANALYZED	METHOD REFERENCE
		*** INORG	ANICS ***			
BOD (5 DAY)		1.0	mg/l	28.3	08/27/92	SM 507/EPA 405.1
ORGANIC CARBON		2.0	mg/t	10.1	09/04/92	
INORGANIC CHLORIDE		200	mg/l	18509	08/27/92	EPA 415.1/SH 505 EPA 300.0
ORGANIC CHLORIDE		0.1	mg/l	NO	09/15/92	SW 9020
CONDUCTANCE		0.1	uhmo/cm	36400	08/27/92	-
COO		10.0	mg/l	978	08/28/92	SM 205
NITRATE		0.2	mg/l	5.5	08/27/92	SM 508A/EPA 410.1
pH		0.1	S.U. 025c	8.63	•	EPA 300.0
TDS		2	mg/l	17870	08/27/92	EPA 150.1/SM 423
rss		2	mg/l	62	08/28/92	EPA 160.1
TOTAL SOLIDS		2	mg/l	17654	08/28/92	EPA 160.2
SULFATE		0.2	mg/l	206	08/28/92	EPA 160.3
		0.2	mg/ t	200	08/27/92	EPA 300.0
		*** HET	ALS ***			
ARSENIC		10.0	ug/l	ND	09/08/92	SW 7060
BARIUM		20	ug/l	200	09/03/92	SW 6010
ADMIUM		5.0	ug/l	ND	09/03/92	SW 6010
HROMEUM		5.0	ug/l	ND	09/03/92	SW 6010
RON		30	ug/l	345	09/03/92	
.EAD		3.0	UG/L	ND	09/10/92	SW 6010
IERCURY		0.20	ug/L	ND	09/10/92	SW 7421
ELENIUM		5.0	ug/l	ND	09/03/92	SW 7470
ILVER		10	ug/l	ND		SW 7740
MUTOO		500	ug/i	2810000	09/03/92 09/03/92	SW 6010 SW 6010

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

⁼ ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

[:] UNABLE TO QUANTITATE DUE TO MATRIX INTERFERENCE

MA_ = NOT APPLICABLE

odology: SM = STANDARD METHODS, 16th EDITION, 1985

EPA = #EPA600/4-79-020, MARCH 1985

^{* =} SURROGATE RECOVERY OUTSIDE OF QC LIMITS

D = SURROGATES DILUTED OUT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

SW = EPA METHODOLOGY, "#SW846", THIRD EDITION, NOVEMBER 1986

1700 W. ALBANY SUITE C BROKEN ARROW, OK 74012 918 251-2858

Client Name: A & M ENGINEERING & ENVIRONMENTAL SERVICES

3840 SOUTH 103RD EAST AVENUE

SUITE 227

TULSA, OK 74146

Client ID:

EQUIPMENT BLANK

Project ID:

IMCO, KY.

SWLO ID:

10838.09

Report:

10838.09

Collected: 08/26/1992

Report Date: 09/16/1992

Page: 1

Received: 08/27/1992

Last Modified:

Matrix: Water

TEST	DATE EXTRACTED	DETECTION LIMIT	UNITS	RESULTS	DATE ANALYZED	METHOO REFERENCE	
		*** INOR	GANICS ***				
BOD (5 DAY)		1.0	mg/l	ND	09/37/03	eu 547.m	
ORGANIC CARBON		2.0	mg/l	מא	08/27/92	SM 507/EPA 405.1	
INORGANIC CHLORIDE		0.2	mg/l	ND	09/04/92	EPA 415.1/SH 505	
ORGANIC CHLORIDE		0.1	mg/l		08/27/92	EPA 300.0	
CONDUCTANCE		0.1		ND	09/15/92	SW 9020	
COO		10.0	uhmo/cm	35.3	08/27/92	SM 205	
HITRATE			mg/l	ND	08/28/92	SM 508A/EPA 410.1	
pH		0.2	mg/l	ND	08/27/92	EPA 300.0	
•		0.1	s.u. a 25c	5.89	08/27/92	EPA 150.1/SH 423	
TDS		1	mg/L	25	08/28/92	EPA 160.1	
TSS		1	mg/L	ND	08/28/92	EPA 160.2	
TOTAL SOLIDS		2	mg/l	58	08/28/92	EPA 160.3	
SULFATE		0.2	mg/l	MD	08/27/92	EPA 300.0	
		*** ME1	ALS ***				
ARSENIC		10.0	ug/l	ND	09/08/92	SW 7060	
BARIUM		20	ug/l	ND	09/03/92	SW 6010	
CADHIUM		5.0	ug/l	ND	09/03/92	SW 6010	
CHROMIUM		5.0	ug/l	ND	09/03/92	SW 6010	
IRON		30	ug/l	ND	09/03/92	SW 6010	
LEAD		3.0	UG/L	ND			
MERCURY		0.20	ug/L	ND	09/10/92	SW 7421	
SELENIUM		5.0			09/05/92	SW 7470	
SILVER		10	ug/l	ND	09/03/92	SW 7740	
MU1002			ug/l	ND	09/03/92	SW 6010	
**************************************		500	ug/l	6290	09/03/92	SW 6010	

ND = NOT DETECTED ABOVE QUANTITATION LIMIT

⁼ ANALYTE DETECTED IN BLANK AS WELL AS SAMPLE

⁼ UNABLE TO QUANTITATE DUE TO MATRIX INTERFERENCE

NA = NOT APPLICABLE

hodology: SM = STANDARD METHODS, 16th EDITION, 1985 EPA = #EPA600/4-79-020, MARCH 1985

^{* =} SURROGATE RECOVERY OUTSIDE OF QC LIMITS

D = SURROGATES DILUTED OUT

J = ESTIMATED VALUE: CONCENTRATION BELOW LIMIT OF QUANTITATION

SW = EPA METHODOLOGY, "#SW846", THIRD EDITION, NOVEMBER 1986

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APPENDIX C

COPY OF PROPERTY DEED

Oct 9 。2:51

DEED

P 2: 51 THIS DEED OF CONVEYANCE made and entered into this BOOK-346 day of 2006 bec, 1988, by and between CITY PAGE. OF MORGANTOWN INDUSTRIAL HOLDING CORPORATION, of Morgantown, Butler County, Kentucky, GRANTOR, and INTERNATIONAL METAL COMPANY, an Oklahoma Corporation, of P. O. Box 1070, Sapulpa, OK 64066, GRANTEE.

WITNESSETH:

the receipt of which is hereby acknowledged, the GRANTOR has THOUSAND AND NO/100 DOLLARS (\$60,000.00) cash in hand paid, bargained and sold and by these presents do hereby bargain, County, Kentucky, and being more particularly described as simple, a certain tract or parcel of land lying in Butler sell, alien, grant and convey unto the GRANTEE, in fee That for and in consideration of the sum of follows, to-wit:

Being a 187.596 acre tract of land located Southwest of the junction of Ky Hwy. 1468 and Ky Hwy. 70, approximately 1.5 miles west of Morgantown, Butler County, Kentucky and more particularly described as follows: Beginning at an iron stake in the South right of way of Ky Hwy 70 515.00 feet west of the intersection of the right of way with the western right of way of Ky Hwy 1468; thence S 18 deg. 56 min. 38 sec. E 1001.82 feet; thence S 65 deg. 29 min. 59 sec. E, 742.49 feet; thence S 62 deg. 30 min. 64 sec. E, 742.49 feet; thence S 62 deg. 30 min. 04 sec. E, 429.00 feet; thence S 62 deg. 30

1050 1000

ν. • survey performed by Mark P. Johnson, KY REG. #2557 revised June 16, 1988.

Morgantown, Butler County, Kentucky, by deed dated June 9, 1988, and recorded in Deed Book 119, Page 37, records of the Butler County Clerk's Office. Morgantown Industrial Holding Corporation, of Being the same property conveyed to City of

simple, its successors and assigns forever, with covenant of TO HAVE AND TO HOLD the above described property appurtenances thereunto belonging unto the GRANTEE, in fee together with all improvements located thereon and GENERAL WARRANTY.

IN TESTIMONY WHEREOF, witness the hand of the

GRANTOR this the day and date first above written.

STATE OF KENTUCKY COUNTY OF BUTLER a hyping, Notary Public in and for the State and County aforesaid, do hereby certify an Oklahoma President, of City of Morgantown Industrial Holding Corporation, to be its official free act and deed Corporation, was this day produced to me and duly Corporation to International Metal Company, President, of City of Morgantown Industrial 1000 that the foregoing deed from acknowledged before me by

"day of GIVEN UNDER MY HAND this

11 11

TAY 250 single, party of BbbK an OklahRRE this the 7th day of Corporation, of P. O. Box 1070, Sapulpa, OK 74066, party of the CO., entered into INTERNATIONAL METAL July, 1988 by and between EXIE RUTH HAWES, made and THIS DEED and part, second part. first

WITNESSET'H:

tion of the sum of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), bargain, sell and convey unto the party of the second part, its successors and assigns, a certain tract or parcel of land, lying in Butler County, Kentucky, and more particularly described as cash in hand paid, the receipt of which is hereby acknowledged, has bargained and sold, and by these presents, does hereby That the party of the first part, for and in considerafollows, to-wit:

TRACT ONE

Being a 7.633 acre tract of land located Southwest of Morgantown, Butler County, Kentucky and more particularly described as 1468 and of the junction of Ky Hwy. approximately 1.5 miles west follows:

intersection of the South Right of Way line of Ky Hwy. 70, with the Southwest Right of Way line of Ky Hwy. 1468; thence from the point of beginning with point of the Southwest line of Ky Hwy. 1468, S 45 deg. 36 min. 38 sec. E, 122.23 feet to a concrete right of way marker, thence continuing with the aforesaid Beginning on an iron stake located at the

#2557 on 4-16-88, using a bearing taken along Coleman and Martin's line.

TRACT TWO

Being a 12.538 acre of land located Southwest of the junction of Ky Hwy. 1468 and Ky Hwy. 70 approximately 1.5 miles West of Morgantown, Butler County, Kentucky and more particularly described as follows:

Beginning on an fron pin stake located at a point where the Southwest right of way line of Ky. Hwy. 1468 intersects the centerline of Renfrow Creek, a new division corner to Parcel A and Parcel B; thence with the Southwest right of way line of Ky. IWY. 1468, S 28 deg. 30 min. 06 sec. E, 260.27 feet marker; thence the aforesaid right of way, S 41 sec. E, 27.90 feet to an iron stake, a northernly corner to Coleman and Martin's tract of land, recorded in Deed Book 109, Page 269 thence leaving the aforesaid right of way with Coleman and Martin's Gardner Lane Road; thence with Coleman and Martin's Road; thence with Coleman and Martin's line N 18 stake, located in Renfrow Creek, a new division corner to Parcel A and Parcel B, referenced S 18 and Martin's line, Road S 12 deg, 30 the 01d Coleman and Martin's tract of land, the north side of the Old Gardner Lane deg. 56 min. 38 sec. E, 235.00 feet from an 1ron stake, located in the South right of way line of KY of Renfrow Creek, sald iron stake being an easternly corner to Coleman and Coleman and Martin's line N 62 deg. 30 min. W, records of the Butler County Court Clerk's Office, Creek, iron stake, 59 sec. W, 742.49 feet to an iron stake, 56 min. 38 sec. W, 766.82 feet to an and Martin, South of line, crossing the Old Gardner Lane Road N to an мау corner; thence with Coleman 142.12 feet to an iron stake, crossing the Old Gardner Lane 429.00 feet οĘ Hwy. 70, on the East bank right corner to Coleman Bec. W, a concrete continuing with deg. 55 min. 29 corner to located on 29 min.

TO HAVE AND TO HOLD said tract of land, with the appurand assigns, forever, with covenants of General of the second part, tenances thereunto belonging unto the party its successors Warranty

30 34

IN TESTIMONY WHEREOF, the party of the first part has hereunto subscribed her name the day and date aforesald

EXIE RUTH HAWES

THE GRANTOR/MORTGAGOR AND IS NOT THE RESPONSIBILITY OF PROPERTY DESCRIPTION CONTAINED HEREIN IS FURNISHED BY WITHOUT THE BENEFIT OF A TITLE EXAMINATION AND THE THIS INSTRUMENT IS PREPARED BY THE UNDERSIGNED ATTORNEY PREPARING THIS DEED

PREPARED BY:

DEYE AND BRAWING
P. O. BOX 340
MORGANTOWN, KENTUCKY 42261

STATE OF KENTUCKY)

COUNTY OF BUTLER)

... Notary Public in

that the foregoing Deed from Exie Ruth Hawes, single, to International certify ф and for the State and County aforegald

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c 1991 Wilson Jones Company

APPENDIX D

LOGS

APPENDIX E

DST RESULTS AND FORMATION FLUID ANALYTICAL REPORTS

WilsonJones - Quick Reference Index System

APPENDIX F

INJECTION TEST AND ACID JOB RESULTS

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APPENDIX G

DRILLING RECORDS